

EXHIBIT F

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

LATIN MARKETS BRAZIL, LLC D/B/A MARKETS GROUP,
Plaintiff,

-against-

PABLO OLIVEIRA,
Defendant.

- - - - - x

160 Broadway
New York, New York

March 14, 2019
10:25 a.m.

DEPOSITION of **PABLO OLIVEIRA**, the
Defendant in the above-entitled action, held at
the above time and place, pursuant to Notice,
taken before Angela Torregrossa, a shorthand
reporter and Notary Public within and for the
State of New York.

LEX #144179



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A p p e a r a n c e s :

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BY: JEFFREY RISMAN, ESQ.

ALSO PRESENT:

TIM RALEIGH
IMKE RATSCHKO

S T I P U L A T I O N S

IT IS HEREBY STIPULATED AND AGREED
by and between the attorneys for the
respective parties herein, that filing,
sealing and certification be and the
same are hereby waived.

IT IS FURTHER STIPULATED AND AGREED
that all objections, except as to the
form of the question shall be reserved
to the time of the trial.

IT IS FURTHER STIPULATED AND AGREED
that the within deposition may be signed
and sworn to before any officer
authorized to administer an oath, with
the same force and effect as if signed
and sworn to before the Court.

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P A B L O O L I V E I R A, the witness,
herein, having been first duly sworn by
a Notary Public of the State of
New York, was examined and testified as
follows:

EXAMINATION BY

MR. WALLACE:

Q State your name for the record,
please.

A Pablo Oliveira.

Q State your address for the
record, please.

A 260 Kenbrook Way, Apartment 304,
Davenport, Florida, 33896.

Q Mr. Oliveira, my name is Jonathan
Wallace, I am the attorney for the plaintiff,
Markets Group, and for the purpose of today's
exercise I will be asking you some questions
and just answer them to the best of your
ability. If I ask a question that confuses
you, please, ask me to rephrase it.

A Okay.

Q Just a note for the court
reporter, you always have to answer

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everything verbally, yes, no or with a statement. She can't get down any body language; nods, shakes of the head and so forth.

A Okay.

Q Thank you.

What is your nation of origin?

A Brazil.

Q Can you tell me about your education, what level of education did you reach?

A Bachelor's Degree Business Communication, specialization business analytics from Wharton.

Q Are those two different degrees?

A Yes, one is just a Bachelor's Degree and the other one is specialization.

Q Specialization?

A Yes.

Q Is that in the nature of a certificate or a Master's, is there some other way to describe it?

A Certificate.

Q How long is that course or

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program to get this specialization from
Wharton?

A About six months.

Q What year did you do that?

A 2017.

Q You spent part of your life in
Brazil before coming to the United States?

A Yes.

Q What year did you come to the
United States?

A 2003.

Q Then you went to school here?

A Yes.

Q The Bachelor's you mentioned, you
may have told me and I just don't remember,
in what institution?

A Baruch College.

Q So you were here in New York
City?

A Yes.

Q Did you live in New York from
2003 onwards?

A Yes -- I am not sure.

MR. RISMAN: Objection.

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If you can clarify, it's not clear. Objection to form.

Q What years did you live in New York City?

A 2003 to 2016, -- well, 2016.

Q Did you go to high school here?

A Yes.

Q Did you come with your family?

A Yes.

Q What year did you graduate from Baruch?

A 2012.

Q So there was a gap between being at Baruch and getting the specialization at Wharton?

A Yes.

Q What did you do in between?

MR. RISMAN: Objection to form.

Q If you can answer it just go ahead and answer it.

A New York Life I worked and then Markets Group.

Q Was New York Life your only job

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between college and working at Markets Group?

A Yes.

Q Did you work at New York Life here in New York City?

A Yes.

Q What year did you start New York Life?

A 2012.

Q When you were first hired there what was your job title?

A An associate.

Q What were your responsibilities?

A Building Excel lists, cold calling, researching online to find names and people, cold calling, e-mailing.

Q Is that your full answer?

A And sales.

Q What did the sales that you did consist of?

A Insurance.

Q That was the product that you sold?

A Correct.

Q How did you sell insurance?

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A By doing what I just mentioned,
e-mail, calling, e-mail.

Q What department did you work in?

A Insurance sales.

Q Would you describe it as being
part of sales and not a marketing activity?

MR. RISMAN: Objection to
form.

You can answer.

Q When he objects to form you can
go ahead and answer my question, if you find
it confusing you can tell me.

A Sales and marketing and e-mailing
people as well.

Q There weren't different
departments at New York Life, there was one
department that did sales and marketing?

A When you sell you also have to do
the marketing, so you write the e-mails that
you come up with.

Q Was there a separate marketing
department that provided you with collateral
such as brochures or website, anything else
that you used in your activities?

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A No.

Q Did you in your job as an associate have the opportunity to close the sale yourself?

A Yes.

Q Did you receive commissions on sales that you closed?

A Yes.

Q When you say you built Excel lists, what lists did you build?

A I am not sure I understand the question.

Q There were lists of what?

A Can you be more clear about it?

Q Yes, was it names, leads of other information?

A Yes, leads, people, companies, wealthy people.

Q Where did you get the information that went into the Excel spreadsheets?

A Publically Available, LinkedIn, google research, name at Excel LS on google, you find a bunch of other lists targeting New York City, you find those as well.

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2 Q And then you would --

3 MR. RISMAN: Objection.

4 I don't know if he was
5 finished answering the question.

6 MR. WALLACE: I apologize,
7 of course.

8 MR. RISMAN: Let him finish
9 answering your question and he
10 will give you the same courtesy.

11 MR. WALLACE: No problem.

12 A It's very easy, that is all.

13 Q I am sorry?

14 A I just said it's very easy, it's
15 very easy in regards to how to find people,
16 it's a very simple job.

17 Q So the names that you found with
18 which you built your Excel spreadsheets did
19 you then send the e-mail to some of those
20 people?

21 A Can you ask me again, what do you
22 mean?

23 Q Did you send e-mail to any of the
24 people in your Excel spreadsheet?

25 A Yes.

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Q Did you write that e-mail
yourself?

A Of course, I built the list. I
did research as I just mentioned previously;
first name, last name at Excel S, name of the
company, region, all that is publically
available on google.

Q Did you also in building these
spreadsheets find that phone numbers were
publically available sometimes?

A Phone numbers are always
publically available either on websites or on
those lists that I find on google or the
research I would do on my own.

Q What lists are you describing
that you found on google?

A What do you mean?

Q What lists are you describing,
you mentioned lists that you found on google.

MR. RISMAN: Objection.

Asked and answered.

MR. WALLACE: He didn't
answer it, the answer was what do
you mean.

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MR. RISMAN: He mentioned
Excel lists.

Q I did not understand that, so
you're saying you found Excel spreadsheets
that were publically available on google?

A I already answered.

Q This is going to take a lot
longer to get through if you don't answer
questions and so when he says asked and
answered he is stating that for the record in
case we ever discuss this with court later.
It's not a signal or instruction to you not
to answer my question, so you're still
obliged to do your best to answer my
question. If I ask you simple questions like
what lists did you find on google and you ask
me to rephrase them we are going to be here a
lot longer today.

MR. RISMAN: Jonathan,
respectfully, all the depositions
to date same type of questions
are being answered and I have to
tell you that they were answered
in a very evasive fashion, so if

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you think this is evasive you're dead wrong and he's answering to the best of his abilities. So if he's telling you he doesn't understand your question then you should respect what he's telling you.

MR. WALLACE: Well, I have been, I certainly have been and if we also start talking about some of the things that happened at the two other depositions then we will also be here all day. I am going to resist the temptation to do that and just move ahead.

Q So just assume I didn't understand because I did not.

You testified that you found Excel spreadsheets by doing google searches. I am not personally familiar with people making Excel spreadsheets of sales information and posting them on the internet to be found with a google search, so can you, please, just describe to me what kind of

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Excel spreadsheets you're testifying you found on a public internet search.

A People just post a variety of lists online, it is publically available. Not only when you do some research like I said, first name, last name, at e-mail and/or the company handle. People build those lists, some people do make them publically available.

Q For what purpose would someone make a list like that publically available?

MR. RISMAN: Objection to form.

A Can you repeat that question?

MR. WALLACE: Please read back the question.

(Whereupon, the record was read by the reporter.)

A I am not sure, you have to ask the people that make it publically available.

Q What insurance products were you selling?

A Regular insurance.

Q I am not sure what regular

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insurance means, would that be life insurance, health insurance, accident insurance?

A Life insurance.

Q Was that targeted to any particular communities or demographic?

A No.

Q The leads that you looking for on the internet, were they mainly business executives or private citizens or did it include both?

A Both.

Q Did you receive answers to some of those e-mails that you sent?

MR. RISMAN: Objection to form.

THE WITNESS: Can I answer?

MR. RISMAN: You can answer.

A Yes.

Q Do you know what percentage of the people to whom you sent or called or e-mailed answered?

A I do not remember.

Q Would it have been fifty percent?

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A Do not remember.

Q Do you remember if it was less than fifty percent?

A It was awhile ago, I do not remember.

Q So when someone answers an e-mail that you sent them could what did you do next?

A Usually call or send another e-mail, it all depends.

Q So was your goal to have a telephone conversation with each person who answered you?

A Sometimes.

Q Were you ever able to sell an insurance policy entirely in e-mail conversations without a phone call?

A I do not remember.

Q Did you have phone conversations with some of the people who answered you?

A I don't remember.

Q Did you ever have a phone conversation with a potential customer?

A It's the same question, I don't remember.

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Q You don't remember in the course of that job whether you ever talked on the telephone with a possible customer?

MR. RISMAN: Objection.

Asked and answered.

Q You still have to answer it.

A I don't remember.

Q Did you ever meet any of those customers in person?

A Again it was awhile back, I don't know, I don't remember.

Q Did some of those customers purchase insurance from New York Life?

A I am sorry?

Q Did some of those customers that you contacted from the spreadsheets that you built ultimately purchase insurance products from New York Life?

A Yes.

Q When a customer that you initially contacted for New York Life purchased an insurance product did that person sign a contract with New York Life?

A Yes.

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Q Did you obtain the signature of that contract yourself or did someone else do it?

A I don't remember.

Q Were you ever licensed as an insurance sales person?

A I passed the test, so yes I believe so.

Q What year did you take the licensing test?

A 2012.

Q Did you take it immediately upon starting that associates job at New York Life or some time later?

A I don't remember.

Q In making a sale for New York Life did you work alone or as part of a team?

A Part of a team.

Q Would others on the team sometimes talk to the same customer that you were talking to?

MR. RISMAN: Objection to form.

You can answer.

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2 A Can you repeat the question,
3 please?

4 MR. WALLACE: Read it back.

5 (Whereupon, the record was
6 read by the reporter.)

7 A I assume so.

8 Q When a customer signed a contract
9 with New York Life were you sometimes the
10 only person who had talked to that customer
11 up to the moment they signed the contract?

12 MR. RISMAN: Objection to
13 form.

14 You can answer.

15 A Please repeat the question.

16 (Whereupon, the record was
17 read by the reporter.)

18 A I am not sure.

19 Q Would another team member
20 sometimes talk to your customer?

21 MR. RISMAN: Objection to
22 form.

23 You can answer.

24 A Again I assume so.

25 Q Would another team member always

1 P. Oliveira 21

2 talk to your customer?

3 MR. RISMAN: Objection to
4 form.

5 MR. WALLACE: Just out of
6 curiosity --

7 MR. RISMAN: You're calling
8 for speculation the entire time
9 here.

10 MR. WALLACE: I am not
11 asking him to speculate, I would
12 expect him to remember if other
13 people talked to his customers.

14 MR. RISMAN: How would he
15 know if other people talked to
16 his customers?

17 MR. WALLACE: Off the
18 record.

19 (Whereupon, a discussion was
20 held off the record.)

21 MR. RISMAN: Back on the
22 record.

23 This is on the record, again
24 you're mentioning "always" in the
25 question, how is that not calling

P. Oliveira

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for speculation?

MR. WALLACE: I am asking if

he knows, does he know as a

matter of process at New York

Life in the sales that he did.

Q It's perfectly simple, when you work as a member of the team, because later I am going to ask you the same questions about how you work today in your present company, you follow a sales process typically and you would know as a matter of personal knowledge and experience, not as a matter of speculation, because we are using words in their plain English fashion here, whether it's part of your process that another team member helps make a sale or not. So I am going to rephrase that question and specify that I am asking you about your sales process at New York Life.

Would it be typical when you were making a sale of an insurance product at New York Life for another New York Life employee to talk to your customer?

A I assume so.

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Q Do you remember?

A Not 100 percent.

Q Do you remember some lesser
percentage?

A No.

Q Do you remember with regard to
any particular sale that you made?

A Do I remember what about any
particular sale?

Q First of all, do you remember any
individual sale that you made at New York
Life?

A I don't remember.

Q How many years did you work at
New York Life?

A About five, six months.

Q Five, six months you worked
there?

A Yes.

Q Did you receive any promotions
during the five or six months that you worked
there?

A No.

Q Did you receive any increase in

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salary?

A No.

Q Did your title or responsibilities ever change?

A No.

Q So you were an associate the whole time?

A Correct.

Q Did you have a boss at New York Life?

A Sorry.

Q Did you have a boss, did you report to someone?

A Yes.

Q What was that person's title?

A I don't remember his title.

Q The Excel spreadsheet that you testified that you built, not the ones that you found, you testified you built an Excel spreadsheet as part of your duties as an associate, correct?

A Correct.

Q What were the fields in that spreadsheet?

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A First name, last name, e-mail,
phone number.

Q Was there anything else?

A No.

Q Did you want to know if a
customer already owned life insurance?

A No.

Q Did you want to know how old they
were?

A Not at all.

Q Did you have any interest in what
their medical or health history was?

A No.

Q Was it part of the process of New
York Life that once you had built that
spreadsheet you gave it or sent it to anyone
else in New York Life?

A I don't remember.

Q Where was that spreadsheet kept,
where did you save the spreadsheet when you
were building it?

MR. RISMAN: Objection to
form.

A I don't remember.

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Q Was it on a New York Life
computer?

A I don't remember.

Q Did you work in the New York Life
office?

A Some days.

Q Where did you work other days?

A Home.

Q Did you do any work on your own
laptop or your own computer?

A I don't remember.

Q Where did you go to work after
New York Life?

A Markets Group.

Q So you started at Markets Group
when you were about six months out of school?

A Correct.

Q What did you do to find that job
at Markets Group?

A I think that I found them on
Craig's List, I do not remember.

Q Did you interview for the job at
Markets Group?

A Yes.

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Q Do you remember with whom you had an interview.

A With Tim, CFO.

Q Did you see anybody else at that first interview?

A I don't remember.

Q Was there a second interview?

A I don't remember.

Q There came a time when Markets Group offered you a job?

A Yes.

Q What was the title of the job that they offered you?

A Intern.

Q What was the compensation for that job?

A Ten dollars an hour.

Q When did you start work at Markets Group?

A Month, it was January of 2013 and I don't remember the date.

Q Were you working full-time at Markets Group?

A As an intern.

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Q Did you work anywhere else at the same time?

A Yes.

Q Where else did you work?

A Teaching volley-ball.

Q How much time did you spend teaching volley-ball?

A Evenings and Sundays.

Q Were you paid for teaching volleyball?

A Yes.

Q Had you also taught volleyball while you were at New York Life?

A I don't remember when I started.

Q Did you work in the Markets Group office?

A Yes.

Q Where was the office located at that time?

A Ten West 37th Street.

Q Ten West 37th?

A Correct.

Q How many hours a week did you work approximately at Markets Group at that

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time?

MR. RISMAN: Objection to
form.

What time period?

MR. WALLACE: At the time
that he took the job.

A Which one, as an intern?

Q When you first started to work at
Markets Group.

A As an intern or full-time?

Q When you first started to perform
your very first services at Markets Group how
many a hours week did you work?

A Until when?

Q As of the beginning of the time
that you started performing services at
Markets Group, your first week, second week,
your first month, how many hours did you work
per week?

A First month forty hours per week.

Q Was there ever a time after that
at Markets Group where you worked less than
forty hours a week?

A No.

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Q Did it ever come to be the case that you worked more than forty hours a week?

A Yes.

Q What were those circumstances?

A Upper management would ask me to stay longer or some come in earlier.

Q Was that something that happened from time to time or was there a period of your employment where you consistently worked more than forty hours?

A Very often they would make us work over forty hours.

Q For what period of time did you receive \$10 an hour?

A I don't remember.

Q Was it more than a year?

A No, but I don't remember how many months I stayed as an intern.

Q But it was for some period of months?

A Yes, correct.

Q What were your responsibilities during the time that you were being paid \$10 an hour?

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A Same as New York Life to build lists.

Q Did you keep those lists in an Excel spreadsheet?

A From which list?

Q You just testified that it was your job at Markets Group to build lists. I am now asking you whether the lists that you referred to were kept in Excel?

A At New York Life they were kept in Excel.

Q You just testified that your job at Markets Group was to build lists. I am asking you whether those lists that you developed at Markets Group were kept in Excel?

A They were kept in Excel.

Q Thank you.

During that same timeframe did you use any other applications in Excel?

A Which timeframe?

Q The timeframe that you're testifying to that you built those Excel spreadsheets, the same timeframe when you

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were being paid \$10 an hour.

A Can you repeat the question?

(Whereupon, the record was
read by the reporter.)

A Can you repeat just the question?

Q That was the question.

Until I say so every question
that I am asking you has to do with the
period of time about which you testified you
were being paid \$10 an hour at Markets Group.

A Okay.

Q You testified that during that
period of time you used Excel spreadsheets.
I am asking you whether during that period of
time you used any other applications on the
job for Markets Group than Excel?

A No.

Q Did you use any mail application?

A I don't remember.

Q Did you use Microsoft Word or
another word processing application?

MR. RISMAN: Objection to
form.

MR. WALLACE: You have an

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objection to the form of the
question?

MR. RISMAN: Yes.

Do you want me to clarify, I
can do that for you?

MR. WALLACE: No, I really
don't.

Can you read back the last
question?

(Whereupon, the record was
read by the reporter.)

A I don't remember.

Q Was it part of your job to
prepare any documents, any memoranda, to
write any letters or to do anything else in
writing?

A Not that I remember.

Q So the Excel spreadsheets that
you worked on, where did you find the
information that went into those Excel
spreadsheets?

A Online or on google publically
available, first name, last name at e-mail
handle or first name last name at Excel S and

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I would find publically available lists.

Q What do you mean at Excel S?

A Excel S is a form on google.

When you research you will find spreadsheets,
Excel spreadsheets with client names, e-mail
and phone number.

MR. WALLACE: Let's take a
minute.

(Whereupon, a recess was
taken at 10:43 to 10:50.)

MR. WALLACE: Back on the
record.

Q Did you still within that same
period of time when you were getting paid \$10
an hour at Markets Group, when you found on
the internet a name and e-mail did you send
an e-mail to that person?

A As an intern I do not think I was
allowed, I don't remember.

Q When you found a name and phone
number on the internet were you allowed to
make a phone call to that person?

A I couldn't make a phone call
then.

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Q Did there come a time when you could send an e-mail to that person?

A Yes.

Q When was that?

A Maybe April, I don't remember exactly when.

Q After you had been there a few months?

A Right.

Q At that time did you receive a raise in pay?

A I did.

Q What was your new compensation?

A Thirty thousand a year.

Q That was paid as a salary withholding, yes?

A It was salary.

Q You signed a W-4?

A Is a W-4 the one the employer pays taxes?

Q You're receiving a paycheck from which taxes were withheld, correct?

A Yes.

Q How often did you receive that

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paycheck?

A Every two weeks.

Q So during the period of time when you were paid \$10 an hour was any tax withheld?

A I don't remember.

Q Did you keep time-sheets?

A Not that I remember, we were not that organized internally.

Q Who did you report to during the period of time you were being paid \$10 an hour?

A Amir Ouki, O-U-K-I.

Q Spell the first name.

A A-M-I-R.

Q During the period of time when you were being paid \$10 an hour did you receive any training?

A No.

Q Did you receive any training later on?

A I would not call it training.

Q What would you call it?

A Build lists, try to sell.

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Q At any time did anyone give you any guidance on how to do an internet search?

A No.

Q Did you receive any information on Searchlogic?

A What do you mean by Searchlogic?

Q How to write a search.

A No, one of the reasons why I was hired was because I knew how to build Excel and knew had to do research.

Q Well, did you receive any guidance from the company as to what to look for?

A Yes, but it was not the correct target markets.

Q Explain what you mean by it was not the correct target markets?

A They asked me to do research on something, but it wasn't necessarily who we should be researching.

Q Who did they ask you to do research for?

A Developers.

Q What kind of developers?

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2 A Real estate developers.

3 Q When you say it was not the
4 correct market, are you expressing your own
5 opinion?

6 A I believe so.

7 Q Why were real estate developers
8 not the correct market in your opinion?

9 MR. RISMAN: Objection,
10 mischaracterizes the testimony.

11 You can answer.

12 MR. WALLACE: That's exactly
13 what he said.

14 A Because I did not think so.

15 Q For what reason did you not think
16 that real estate developers were the correct
17 target market?

18 A I just did not think they were.

19 Q Who was the correct target market
20 in your opinion?

21 A Real estate managers.

22 Q Can you explain to me what a real
23 estate manager is?

24 A It's a fund, whoever is
25 fundraising for a specific project.

P. Oliveira

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Q Do real estate managers work for real estate developers?

A What, I am sorry?

Q Are real estate managers employed by real estate developers?

A No.

Q They were work for separate entities than real estate developers?

A Yes.

Q Is there a relationship between real estate managers and real estate developers?

A It varies.

Q Well, do real estate managers provide financing to real estate developers?

A I wouldn't know in that case specific.

Q When you came to the conclusion that the correct target market was real estate managers did you make any change in your daily routine as a result?

A I was an intern and then just an associate so no.

Q When you first started being paid

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\$30,000 a year what was your title?

A We were not so organized, so there was not an exact title. They called it associate, then analyst and then relationship manager. There wasn't any specific title, we could write whatever we wanted to.

Q For what period of time did you continue being paid \$30,000 a year?

A I do not remember.

Q Was it more than a year?

A I really don't remember.

Q How many years total did you work at Markets Group?

A Three years and eight months I believe.

Q How much were you making annually your last year with company?

A I believe it was between eighty to ninety thousand.

Q In salary?

A Correct.

Q And additional to that salary did you receive any bonus or commission?

A I was promised a bonus, but never

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received it, but I received a commission.

Q For your last full year of employment do you remember approximately what commission you received, dollar amount?

MR. RISMAN: Objection to form.

A I really do not remember.

Q When during your time at Markets Group did you first start receiving a commission?

A After I was done with internship.

Q So when you were making \$30,000 a year you were eligible for commission?

A Yes.

Q Do you know how that commission was calculated?

A I believe it was -- I believe it was 6.5 percent on the sale.

Q On which sales?

A What do you mean?

Q What sales did you receive a commission on?

A Sponsorships.

Q Were those sales of sponsorships

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that were made by you alone?

A Which one in specific?

Q Did you receive a commission on sales of all sponsorships by Markets Group?

A Can you repeat?

MR. WALLACE: Please read it back.

(Whereupon, the record was read by the reporter.)

A I believe so, but I am not sure if I had any pending -- if I had anything pending when I left.

Q In order to receive a commission on a sale, did you have to be personally involved in the sale?

A Yes.

Q Did you have to be exclusively involved or could somebody else be involved as well?

A Somebody else could be involved as well.

Q If somebody else was involved what role did they play in the sale?

A Same role as I did.

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Q What role did you play in the sale for which you received a commission?

A Could you be more specific?

Q I don't think I can be, what role did you play in the sale for which you received a commission?

MR. RISMAN: Objection, asked and answered.

MR. WALLACE: He never answered it.

MR. RISMAN: You don't like his answer.

A By selling a sponsorship.

Q What is involved in selling a sponsorship?

A E-mail, call, sometimes just e-mail.

Q So in the sense in which you're using the word sponsorship can you explain to me what a sponsorship is?

A It's when you -- it's when you sell to a client, a sponsor, to participate in the conference.

Q And that client is paying Markets

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Group money to participate?

A The sponsor as the client, yes.

Q You're receiving a commission on the money that's collected from that client for that sponsorship?

A Correct.

Q That was 6.5 percent of whatever was collected?

A I believe it was 6.5 percent.

Q If somebody else was involved in making that sponsorship sale did you still receive 6.5 percent?

A No, no, we split it.

Q So there were circumstances under which you might receive half of the commission and somebody else would receive half?

A Right.

Q When you were looking for people on the internet at Markets Group, were you looking for the same kind of people that you would look for at New York Life?

A I don't remember exactly in detail, but mostly were managers that were

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looking for Markets Group.

Q In between the time that you made \$30,000 a year and the time that you made 80 to 90 in the last year did you have other increases in salary in between?

A Yes.

Q What was that first increase after you made \$30,000?

A I don't remember.

Q Do you know how many increases you had in between when you made 30 and when you made 80?

A I don't remember the number exactly, maybe four or five.

Q Four or five increases?

A Three, I don't remember.

Q You testified a little earlier that you might have used the following, that you did at different times use the following titles, associate, analyst, relationship manager, were you using all of those titles when you made \$30,000 a year?

A Yes.

Q So they were interchangeable?

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A Yes.

Q When you were making \$30,000 a year did you now have the right to send e-mails to clients?

A Yes.

Q Did you now have the right to make phone calls to clients?

A Majority, yes.

Q Can you describe for me what was a typical e-mail that you would send to a client during that time?

A Are you asking specific of the e-mail?

Q What you remember, what would you e-mail a client to get your contact with that person started?

A I would put some of the e-mails together, I would get e-mails from other conferences and we would -- you know I would combine them.

Q What I was asking was when you first sent an e-mail to a potential customer what was the contents of that e-mail, what did it say?

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A Asking them to go to the
conference.

Q Would you describe a conference
in that e-mail?

A I don't remember exactly how the
e-mail was written.

Q Were you e-mailing them about a
specific conference that was scheduled?

A Yes.

Q Was the purpose of the e-mail to
ascertain whether they had an interest in
attending the conference?

A That conference in specific?

Q Yes.

A Correct.

Q Did you write those e-mails
yourself?

A Yes.

Q Those e-mails were from you to
the potential customer?

A Correct.

Q What title did you use on that
e-mail?

A Again we were not that organized,

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we had a variety of titles and anybody could change them on their signatures.

Q When you sent an e-mail, we are still talking about the period of time when you were making \$30,000 a year, when you sent e-mails to potential customers did you send those e-mails yourself, one by one or did you use an application that automated the sending of those e-mails?

A In defense sometimes we would send one by one, other times I would put them on a Word document combine them with Excel, send 10,000, 20,000 if I find a list online publically available and ready to go.

Q So out of --

MR. RISMAN: I am sorry, were you finished with your answer?

THE WITNESS: Yes.

MR. RISMAN: Okay.

Q If you sent 10,000, 20,000 e-mails, do you recall how many out of those 20,000 recipients would answer that e-mail?

A No.

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Q Would you say that it was less than fifty percent?

A I don't remember.

Q When somebody did answer an e-mail that you sent them about a conference what did you do next?

A Sometimes answered the e-mail, sometimes call.

Q If you answered their e-mail yourself what did you say in your answer?

A In which occasion?

Q Well, you testified that you would sometimes answer an e-mail, when you would sometimes answer an e-mail what would be your response to that e-mail?

A It depends on what someone wrote to me.

Q Was it your goal when somebody answered an e-mail to try and arrange a telephone conversation with that person?

A Sometimes.

Q Did you have that telephone conversation yourself?

A Sometimes, sometimes I did when I

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was allowed to.

Q When somebody answered one of those 20,000 e-mails that you sent was it ever required of you to give that response to someone else to followup on?

A Please repeat.

MR. WALLACE: Read it back.

(Whereupon, the record was read by the reporter.)

A Not always.

Q Sometimes you gave it to someone else to followup on?

A It depends on the period of time.

Q During what period of time did you give those e-mails to someone else to followup with?

A If it wasn't my focus, so if I was not dealing with lawyers I'd have to give it to someone else to deal with lawyers.

Q So were your job responsibilities divided up by job titles of potential customers?

A Potential customers not job titles, again the titles were very broad.

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Q If you were not dealing with lawyers, the example you just gave us, who were you dealing with during that period of time?

A It would change from time to time. Some managers -- can I answer?

Q Yes.

A Some managers, managers, lawyers, what else, insurance companies. We would divide, I don't remember all the sectors.

Q Did there come a time when you could make the decision whether you wanted to have the phone conversation or would give it to someone else?

A Yes, when I became head of the real estate.

Q When did you become head of real estate?

A I don't remember the exact date.

Q Do you remember what year?

A It was either 2015 or '16.

Q Who were you reporting to as head of real estate?

A To CO and CFO.

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Q Is it your testimony that as head of real estate you reported to Adam and to Tim?

A Correct.

Q Just prior to becoming head of real estate who did you report to?

A I have to think, because the third round was very large, but at that time I believe it was Will Frank.

Q Will Frank?

A Yes.

Q So you testified that when you started you reported to Amir Ouki, right?

A Yes.

Q You have testified you later reported to Will Frank and then to Adam and Tim. Who else did you report to while you were at Markets Group?

A From what I remember that was it.

Q Approximately when did you start reporting to Will Frank?

A When Amir left.

Q Do you remember what year that was?

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A No.

Q Was there a change in your responsibilities at the time that you started to report to Will Frank?

A No.

Q Before being promoted to head of real estate, did you work in a particular market place immediately prior?

A Can you explain your question?

Q Well, you said head of real estate.

A Okay.

Q Is real estate a market place of Markets Group?

A Real estate?

Q Yes.

A Well, yes, but I only focus in Latin America, so head of real estate for Latin America only.

Q Prior to being promoted to that job how would you describe what you were doing?

A There was no change.

Q During the entire time that you

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worked at Markets Group was your focus always Latin America?

A Yes.

Q So when you described building lists when you were being paid \$10 an hour those were lists of people in Latin America?

A Well, building lists, yes, but if I found them online, you know, whoever I would find I would have it there to add it to the list, but the focus was mainly Latin America only.

Q So the events that you were involved in selling to people at that time were those events that took place in Latin America?

MR. RISMAN: Objection to form.

A Yes, and one of them was here in New York, but with a focus on Latin America only.

Q So the people that Markets Group was trying to sell that event to as sponsors or delegates, for the New York events specifically were you trying to get people

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from Latin America to attend that event?

A Yes, it was called the Latin America Institutional Real Estate Conference.

Q Were you trying to get people from the United States to attend that might be interested in Latin America?

A Not that I remember since I was not allowed to talk to US firms.

Q So throughout your time at Markets Group you always sold to Latin America yourself?

A From what I remember.

Q Do you speak Spanish?

A Yes.

Q The e-mails that went out were some of them in Portuguese?

A You asked me if I spoke Spanish.

Q Well, your native language as a Brazilian would be Portuguese?

A Correct.

Q So did you send e-mails in Portuguese?

A I believe so.

Q Did you send e-mails in Spanish?

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A I believe so.

Q Did you send e-mails in English?

A I believe so as well.

Q When you spoke on the telephone to potential clients did you have conversations in all three languages?

A Yes.

Q So there would come a time when you would have your first telephone conversation with a potential customer, correct?

A Correct.

Q When you had that first telephone conversation with a potential customer would you ask them any questions?

A At first, no.

Q Well, what was the nature of that first conversation at first?

A Selling the conference just like selling a car, selling insurance.

Q So the conversation would consist entirely of answering their questions?

A Yes, I would say so in the beginning. I didn't learn how to ask those

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questions at first so everything was on my own.

Q Well, when did you learn how to ask those questions?

A By whatever they would talk to me I started -- I would start picking up things and I started learning what they wanted to hear, what I had to ask.

Q What who wanted to hear?

A The sponsor, the client on the other side.

Q So you're saying that you never received any training at Markets Group as to how to carry on a conversation with a potential client?

A Not that I remember of.

Q Did you ever have an opportunity to listen to another Markets Group employee when they were on the telephone with a client?

A I believe that was implemented later on from what I remember.

Q How much later on?

A I don't remember exactly when.

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Q When you first started working at Markets Group, let's say in the first year, did you have an office of your own?

A I am sorry?

Q Did you have an office of your own?

A At Markets Group?

Q Yes.

A Of my own, no.

Q You couldn't close the door you sat in an open area with other people?

A Correct.

Q Those other people were also on the telephone sometimes?

A Yes.

Q You could hear them talking to their clients?

A I was focused on building lists, I am not sure if I could do both things and actually concentrate on that.

Q So when you taught yourself how to ask questions, what kinds of questions did you begin asking potential clients?

A Do you have a specific firm that

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you're asking or company or anything like that because that is very broad.

Q Well, give me some examples of what kind of questions you taught yourself to ask questions of clients?

A Well, let's say if someone tells me they are fundraising then I learned I had to ask the next client are you fundraising.

Q What did you mean by fundraising?

A Fundraising if you need money for your fund.

Q So you're describing a situation in which the client would be a manager at a real estate investment fund for example?

A A real estate fund.

Q What would be the difference between a real estate investment fund and a real estate fund?

A I wouldn't know, I don't call them a real estate investment funds.

Q What you're describing is a real estate fund would be a for profit company, right, it's a business, right?

A Is there a question?

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Q Yes, just to understand what you mean by these terms, a real estate fund is a company, right?

A Is a company, correct.

Q It's a business, it's in the business world?

A Correct.

Q Is it a business which raises money, you used the phrase fundraising?

A That's what fundraising means.

Q Then do they use that money to invest in real estate projects?

A Correct.

Q Do they use that money to buy real estate if that is different than investing?

A In some cases I think so.

Q So when you testified that you taught yourself to ask somebody if they are fundraising, is it correct to say that what you mean by that is is your real estate fund looking for money right now?

A Right.

Q Is a real estate fund different

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than a real estate developer?

A Yes.

Q Is it correct that typically a real estate fund wouldn't take on the role of developing real estate itself?

A I am not 100 percent sure.

Q You gave me as an example of a question you might ask a potential client, "Are you fundraising?" What are some other examples of questions that you might ask?

A To whom, that is very broad?

Q You were able to come up with that example, "Are you funding?" So to anybody that you had a conversation with who was a potential customer, what are some other examples of questions that you taught yourself to ask them?

A If they say they attend conferences I ask them do you usually attend conferences.

Q Did you ever ask a potential customer if he or she was the decisionmaker in terms of purchasing Markets Group products?

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MR. RISMAN: Objection to
form.

You can answer.

A I am sorry?

Q You can answer.

A No, I don't think so.

Q Did you want to know if the
person to whom you were talking had the
authority to decide to attend your
conference?

A No.

Q Did you ever ask if there were
other employees of the company who might be
interested in attending the conference?

A Please read it back.

(Whereupon, the record was
read by the reporter.)

A Not that I remember.

Q Did you ever ask someone on one
of those phone calls for the names of other
people with the company?

A Not that I remember.

Q What other questions did you ask
them?

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A If they say that they would travel, you know, somewhere for conferences then I would ask them if they would travel.

Q So when you asked these potential clients the questions that you have described and they answered them would you write that information down somewhere?

A No.

Q During the period of time that you were making \$30,000 a year were you still working with Excel spreadsheets?

A Yes.

Q So did it ever come to pass that after you had a conversation with a potential client you added information to an Excel spreadsheet?

A No.

MR. RISMAN: Objection to form.

A No.

Q At the time you were making \$30,000 a year, were you working with any other software than Excel spreadsheets?

A Do you have a specific software?

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Q So it's a simple question, were you working with any software at Markets Group other than an Excel spreadsheet?

A Word.

Q And e-mail, right?

A And e-mail.

Q What e-mail application were you using?

A Outlook.

Q Does the phrase CRM mean anything to you?

A That was implemented way later probably towards when I was about to leave.

Q Do you know what CRM stands for?

A I believe it's customer relationship management.

Q Did Markets Group at some point begin to use a customer relations management application?

A Towards the end when I was about to leave they attempted to use a lot of times, people refused to use it.

Q Did that application have a name?

A It had a name, I just don't

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remember the name.

Q Did you use that CRM application yourself?

A We would add some names and last name and e-mail, but mostly because they really wanted us to do it, but in general we would not put anything aside from first name and last name, e-mail.

Q So before you started to use that CRM application you were still using Excel for the purposes that you described?

MR. RISMAN: Objection to form.

A Right, yes.

Q So focusing on the period of time, let's say, three months approximately right before you got promoted to head of real estate, when you had a conversation with a potential client and they gave you some information about themselves did you write that information down anywhere?

A No.

Q Did you try to remember that information?

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A No.

Q Would you say you have a good
memory?

A Is that a real question?

Q Yes.

A Somewhat.

Q When somebody told you that they
would travel for a conference isn't that an
important thing for you to know about them in
terms of selling them other products in the
future?

A Not necessarily the way we work
there.

Q Explain what you mean by the way
you work there.

A It was a mass e-mail, talk to a
lot of people, move on.

Q When you talked to somebody on
the telephone was there not a possibility
that another Markets Group employee would
talk to that same person a month later or a
year later?

A Can you rephrase the question,
please?

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2 MR. WALLACE: Please read it
3 back.

4 (Whereupon, the record was
5 read by the reporter.)

6 MR. RISMAN: Objection to
7 form.

8 You can answer.

9 A Or at the same time.

10 Q So you might be on the telephone
11 with a potential client would you say on the
12 same day that somebody else called them?

13 A Yes.

14 Q The same week?

15 A Yes.

16 Q Would you be calling about
17 different products than the other person?

18 A Yes.

19 Q So if somebody told you, for
20 example, that they never travelled to a
21 conference, wouldn't that be an important
22 piece of information for other Markets Group
23 sales people to know?

24 A We never cared about that.

25 Q Well, they might save themselves

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the time of calling that person if they know they are never going to buy a product.

A That is not how it worked.

Q How did it work?

A We didn't care, we would e-mail them again and call them again if needs to be.

MR. WALLACE: Read that answer back to me, please.

(Whereupon, the record was read by the reporter.)

Q If needs to be?

A Yes.

Q When you got an answer to a question from a potential client, would you ever e-mail another Markets Group employee describing that answer?

A No.

Q Did you ever talk to your boss about potential clients that you spoke to?

A No.

Q Did anyone ever ask you to call a particular person and speak to them about a conference?

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A Can you repeat that?

(Whereupon, the record was
read by the reporter.)

A No, not that I am aware of.

Q When you were head of real estate
did you have anyone reporting to you?

A Yes.

Q Who reported to you when you were
the head of real estate?

A Roy -- we had a large turnaround
so give me one second, Roy, Francisco.

Which time are you asking me
specifically?

Q During the period of time that
you were head of real estate.

A Right, do you have an exact time,
the turnaround was large, so I am not --

Q Well, I am asking you during that
entire period of time how many direct reports
did you have?

A There was Roy, Francisco and
Aline.

Q Can you spell that, please?

A A-L-I-N-E.

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Q You referred to a turnover, did they report to you at the same time or different times?

A Those?

Q Yes.

A I believe they were in the same time those three.

Q Did you give them any training?

A I personally do not remember since I am not sure if they all came from me. I believe they came from other managers. I am not -- Will was the manager at the time so I am not sure.

Q You're not sure if you trained anybody?

A On the last month we started implementing some things.

Q What was the word you used started what?

A Implementing some training towards the end that I would run, but it was off of a book.

Q What book was that?

A SPIN.

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Q Is that a book from any outside publisher or --

A Outside.

Q Do you remember the author's name?

A I do not.

Q What was the nature of that training that you ran at the end?

A Are you asking what did I teach?

Q Yes.

A Well, I would implement some of the questions that I asked as I mentioned previously plus the Spin book.

Q So you would teach them what questions to ask?

A I would put in a perspective of SPIN, which is Situation, Implication, Problem, Needs, Payoff.

Q Did you ever have anyone reporting to you before you became head of real estate?

A Before I became head of real estate?

Q Yes.

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A Before no, we reported to Amir and then Will.

Q Was there ever anyone reporting to you?

A Right, so while Amir and Will were head of real estate of Latin America are you asking if someone was reporting to me?

Q Yes.

A No, none that I can remember.

Q Were you ever involved in training anybody before you became head of real estate?

A Not that I remember since I was focusing more on Latin America. I don't know, not that I remember, not that I am aware of.

Q Before you became head of real estate, was anybody else working in Latin America other than you and your boss?

A There was a group, which I think it was Capital Infrastructure I believe dealing with Latin America. They had some private equities Latin America, that is all I can remember.

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Q You said that three people reported to you as head of real estate, Roy, Francisco and I think you pronounced it Aline, is that correct?

A Yes.

Q What were their last name?

A Roy was Salsinha, S-A-L-S-I-N-H-A, Aline was Viana, V-I-A-N-A and Francisco Pasqual, P-A-S-Q-U-A-L.

Q You testified earlier that you used Outlook, did you ever use the contact management aspect of Outlook?

A What do you mean?

Q Are you aware that Outlook has a contact management application included?

A No.

Q Other than using it to write e-mails did you use Outlook for any other purpose?

A No.

Q Did you use it to keep a calendar?

A Yes, e-mails, calendar, that is all that I remember.

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Q Did you ever put people's phone numbers into it or any other information about individuals?

A No.

Q When you started work at Markets Group approximately how many employees were there at Markets Group?

A I believe there were about forty-five, fifty.

Q At the beginning?

A At the beginning.

Q When you left how many people were there?

A About sixty, sixty-five.

MR. WALLACE: Let's take a short break.

(Whereupon, a recess was taken at 11:59 to 12:09.)

MR. WALLACE: Back on the record.

Please read back the last question and answer.

(Whereupon, the record was read by the reporter.)

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Q During your whole time in Markets Group you sold some sponsorships, correct?

A Correct.

Q Did you sell anything else besides sponsorships?

A No, not that I can remember.

Q At Markets Group were you familiar with the use of the word delegate?

A Yes.

Q What did delegate mean in the business?

A General admission, they would sell tickets.

Q That's different than a sponsorship, correct, it's different than a sponsorship?

A That is correct.

Q Less expensive than a sponsorship?

A Sometimes.

Q Any way, it was a sale of a single ticket to an event?

A Right.

Q Did you make any delegate sales?

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A Not that I can remember of.

Q When you became head of the real estate group were you then responsible for any delegate sales?

A Can you specify what you mean?

Q Well, what were your overall responsibilities once you got promoted to head of real estate group, were you still just primarily responsible for sponsorships or did you have other duties as well?

A Are you asking which question, there were two questions, right?

MR. WALLACE: Read back my question.

Q Let's stop right there.

A The one before I mean.

Q That was the first question, I asked a second question too.

MR. RISMAN: Objection, compound.

A I think you asked something else.

Q How did your responsibilities change when you became head of real estate?

A Oversee people's metrics, calls

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2 and e-mails to make sure we acquire more
3 clients and sell the other people.

4 MR. WALLACE: Read that
5 back, please.

6 (Whereupon, the record was
7 read by the reporter.)

8 MR. RISMAN: John, I would
9 ask that you let him finish
10 because he looked like he was
11 still answering that question.

12 MR. WALLACE: I didn't see
13 that.

14 Q Do you want to add anything to
15 that answer?

16 A So that they could sell
17 sponsorships.

18 Q You testified that part of the
19 job was to monitor the metrics of your
20 employees.

21 A Yes, right.

22 Q How did you do that?

23 A They would send me a number of
24 the amount of calls they made in e-mails, I
25 believed them, and I would forward them to

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the CFO.

Q So people would keep track of themselves and tell you how many phone calls they made in a day?

A The end of the week they would send it to me.

Q At any time during your employment at Markets Group did Adam ever give you any reports from LinkedIn?

A Not that I remember of.

Q Did anyone ever give you any printouts of leads that you could follow?

A Can you repeat that question?

Q Did anybody ever give you leads to follow?

A Not that I remember.

Would they say -- are you asking me if there were, let's say, websites and go after these websites and build the lists.

Q Did people tell you to build a list from a website?

A Right, correct.

Q What website would that be, would it be the website of a particular company?

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A Could be of a lot of different companies, but most of these leads would come from again our own, all of these leads would come from research and what is publically available. A lot of them as I mentioned previously would be on that first name, last name at of Excel S, the company name. If you go on, let's say, a company like an auditor Ernst & Young and you find the name of the person and you type that name and Ernst & Young and you see a bunch of reports, PDF reports with all e-mails as well, so all of those were publically available.

Q So somebody might say to you go look at the Ernst & Young website and get some names and phone numbers?

MR. RISMAN: Objection to form.

You can answer.

A I wish I had that guidance, but no.

Q Well, you testified a moment ago that sometimes people did ask you to go look at particular websites, right?

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A They would mention it, but they wouldn't give it to me to do it.

Q But would you do it on your own when you heard somebody mention a website?

A I would say it's part of research.

Q At Markets Group did you use the word products to describe what Markets Group sold?

A Not that I remember of.

Q You testified you sold sponsorships, so those sponsorships were they all related to conferences?

A Conferences.

Q So that is a yes?

A Right.

Q Did you sell anything that didn't relate to a conference or your markets group?

A No.

Q Did Markets Group have any businesses that weren't related to conferences during the time that you worked there?

A Not that I know of.

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Q Did you attend any of the conferences that were sponsored by Markets Group?

A I am not sure I understand your question.

Q The conferences that Markets Group organized did you attend any of them personally?

A Yes.

Q How many did you attend?

A I am not certain of the number, but I believe around ten or so.

Q Ten events total in all the years you were there?

A I believe so.

Q Did you attend any events in Latin America?

A Yes.

Q What countries?

A Brazil, Columbia and Mexico.

Q When did you first attend an event for Markets Group?

A I believe it was around June, around June of the first year.

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Q Were you still making \$10 an hour at the time?

A I don't think so, but I am not 100 percent sure, but I don't think so.

Q Did you attend any events when you were making \$30,000 a year?

A Yes, I would say so.

Q Did you attend any events outside of Latin America?

A As I mentioned previously the one in New York focused on Latin America.

Q So you went to the New York event as well, did you go to the New York event every year?

A Yes.

Q Did you speak at any of the events that you attended?

A I believe I did by introducing the conference for five minutes, but mostly were managers that would do it.

Q Managers that would do what?

A That would introduce for three minutes or so the conference.

Q But you testified that you would

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introduce some conferences for a few minutes
at the outset, correct?

A When I became the head of real
estate for Latin America.

Q So prior to becoming head of real
estate, did you ever have occasion to speak
at a conference?

A Not that I can remember of.

Q So before you became head of real
estate, whenever you would attend a
conference what were your responsibilities at
the conference?

A Greeting people to welcome them,
stay by the registration desk if other people
would come in and if they needed anything I
would be there.

Q For example, what kind of help
would they need?

A Water, food.

Q Did you make any sales while you
were at conferences?

A While at the conference?

Q Yes.

A Not that I can remember of.

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Q Did you do any entertaining at conferences?

A Would you describe entertaining?

Q Take any clients out to dinner.

A Not that I remember of.

Q Did you take any client out for drinks?

A What period are you asking?

Q After you became head of real estate.

A I remember once, but I was never reimbursed although I asked for it.

Q So you're saying that you only once took a customer out for a drink at a conference?

A I am saying that I don't remember, but also there is a cocktail hour during the conference --

Q Did you ever talk to --

A Which is part of the conference itself.

Q Did you ever talk to anyone about coming back for another conference?

A Coming back where?

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Q To another Markets Group
conference?

A Which region?

Q Any region.

A I don't think we would, I think
we would just get back to followup and
blasting e-mails and hoping they would come
back.

Q Did you ever talk to a sponsor
about whether they were happy with the
conference?

A Read that back to me, please.

(Whereupon, the record was
read by the reporter.)

MR. RISMAN: Note my
objection to form on that one.

A Sometimes we would, but we would
prefer not to.

Q Well, did a client ever approach
you and say that they didn't feel they got
their monies worth?

A A lot of times, that is why --
that is one of the reasons why we wouldn't
ask them.

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Q When you got information from a client about their conference experience did you tell anybody that information?

A We would talk about it, but it didn't matter it was all about the next one.

Q Well, did people come back and sponsor another conference sometimes?

MR. RISMAN: Objection to form.

A Sometimes, I would say the Latin America was tough, a lot of people disliked the conferences, so it was tough to get them back.

Q But you sometimes did get them back, it wasn't impossible?

MR. RISMAN: Objection to form.

A Sometimes.

Q When a client expressed a feeling about a conference did you write that information down anywhere?

A Not that I could remember of.

Q When a CRM application was introduced, did you use that to record any

1 P. Oliveira 87
2 information about conversations with clients?

3 A No.

4 MR. WALLACE: Off the
5 record.

6 (Whereupon, a discussion was
7 held off the record.)

8 Back on the record.

9 Q Where were you living when you
10 started working at Markets Group?

11 A In Astoria.

12 Q When you left Markets Group were
13 you still living in Astoria or had you moved
14 somewhere else?

15 A I was living in New Jersey.

16 Q When did you move to New Jersey?

17 A I did a lot of moves, are you
18 asking for my last address in New Jersey?

19 Q I am not asking for your address
20 at all, just --

21 A What timeframe are you asking
22 then?

23 Q Do you still today maintain a
24 residence in New Jersey?

25 A No.

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Q No?

A No.

Q You live in Florida too?

A Correct.

Q Do you maintain an apartment in
New York City?

A No.

Q Does LinkBridge maintain an
apartment in New York City?

A No, just the virtual office.

Q Are you saying that LinkBridge's
office in New York is a virtual office?

A I would say so, but it can have
also meetings there.

Q How many employees does
LinkBridge have today?

A Employees?

Q Yes.

A Two.

Q Who are they?

A Myself and Naira.

Q What is Naira's last name?

A Oliveira.

Q Are you related?

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A Yes.

Q What is the relationship?

A My wife.

Q At any time since you founded LinkBridge had you had other employees working for you?

A Not employees, independent contractors.

Q For example, I have seen some e-mails that had the name Souza, correct?

A Correct.

Q Who is Souza?

A Independent contractor.

Q Do you still work with Souza, what is Souza's first name?

A Claudio.

Q Do you still work with Claudio Souza?

A Sometimes, it's freelance.

Q Where does Claudio Souza work from?

A He's in Brazil.

Q So it's your testimony that the day-to-day activities of LinkBridge take

P. Oliveira

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place in Florida?

MR. RISMAN: Objection to

form.

You can answer.

A If you're asking do we make calls
and e-mails from Florida?

Q Yes.

A Correct.

Q So if I look on your website I
think I see an address in New York City on
Avenue of the Americas.

A Correct.

Q Whether they are employees or
independent contractors, do you have anybody
who on a regular basis sits at that address?

A Whenever we have meetings someone
will go in.

Q Do you have anybody who is at
that address every week?

A If there are meetings.

Q So when you described it as being
a virtual office is it one of those office
service places?

A Correct.

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Q You signed a contract with them?

A Yes.

Q If you have a meeting there do you have to pay an hourly rate for the space?

A So we have a certain amount that we can use the office.

Q You pay some kind of a monthly rate for the space?

A Right now, yes.

Q Is there anyone who works for you, either an employee or independent contractor who could be described as being based in the space?

MR. RISMAN: Objection to form.

A They go in sometimes.

Q Now, you testified that meetings are held in the space.

A Correct.

Q Would those be meetings with clients?

A Correct.

Q Are there any meetings that are solely between people working for LinkBridge?

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A Read that back.

(Whereupon, the record was
read by the reporter.)

A So if there are meetings between
myself and someone who works at LinkBridge?

Q Yes.

A No, not that I can think of.

Q So typically if you're using the
space it's to meet an outsider or potential
client or a client?

MR. RISMAN: Objection.

Asked and answered, you can
answer.

A Potential sponsor client,
correct.

Q How often are you in the space
yourself?

A Whenever there are meetings.

Q How often are there meetings?

A It varies.

Q Are there meetings every month?

A Some months.

Q Who else attends those meetings?

A Either myself or George.

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Q Who is George?

A Independent contractor.

Q What is George's last name?

A Devolder.

Q Spell it, please?

A D-E-V-O-L-D-E-R.

Q What is George's role in
LinkBridge?

A Selling sponsors to clients
whenever he wishes.

Q Somewhat of your old job in
Markets Group?

A Not necessarily, wasn't whenever
I wished.

Q When you say whenever George
wishes what do you mean by that, what does
George do when he's not selling sponsorships?

A His personal life, I am not sure.

Q So what you're really just saying
he just works for you part-time?

A He's an independent contractor.

Q Does George submit timesheets?

A No.

Q How do you pay George?

1 P. Oliveira 94

2 A I am sorry?

3 Q How is George paid?

4 A Commission.

5 Q Commission only?

6 A Correct.

7 Q What does Claudio Souza do for
8 LinkBridge?

9 A Whenever he can he e-mails people
10 that I ask, builds lists. I taught him how
11 to build lists.

12 Q You trained Claudio on how to
13 build lists?

14 A I taught him how to build lists,
15 correct.

16 Q How are those lists maintained?

17 A What is your question exactly?

18 Q What application do you use to
19 maintain those lists?

20 A Excel.

21 Q Does LinkBridge use a CRM
22 program?

23 A We do not.

24 Q Everything is done in Excel?

25 MR. RISMAN: Objection to

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form.

A Correct.

Q You're still using Outlook for
your e-mail?

A Yes.

Q Microsoft Word?

A Sometimes, depending on the
e-mails.

Q Approximately how many times did
you travel to New York in 2018?

A I do not remember that.

Q More than five times?

MR. RISMAN: Objection.

Asked and answered.

A I really don't remember.

Q More than once?

A Absolutely.

Q But you don't know if it was more
than five times?

A I don't, I don't remember.

Q Where do you stay when you come
to New York?

A At my mother's house.

Q Your parents still live here?

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A Yes.

Q Is your Florida address on your tax returns?

A Is my Florida -- I am sorry.

Q Do you use your Florida address on your tax returns?

A Yes.

Q You have a Florida driver's license?

A Yes.

Q What other independent contractors work for LinkBridge?

A That's it.

Q Just those two?

A Yes.

Q Is Naira an employee of the company?

A Yes.

Q You pay her a salary?

A No, she is I would say a partner.

Q What form is the company, is it a LLC?

A Correct.

Q Is she an equal partner?

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A I would have to check with my accountant.

MR. RISMAN: Off the record for a second.

(Whereupon, a discussion was held off the record.)

MR. WALLACE: Back on the record.

Q Your personal tax returns do they give your Florida address just to clarify?

A Personal, yes.

Q When did you incorporate LinkBridge?

A I believe it was September of 2016.

Q Why did you incorporate LinkBridge in September of 2016?

A Because I had mentioned to my CFO that I would leave and have my own business.

Q By the way, when you say your CFO do you mean Tim?

A Correct.

Q Did you mention that were you leaving to Tim before you incorporated

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LinkBridge or afterwards?

A Before. We had a conversation and I mentioned -- well, I recorded about that I would need some time to get my accountant ready and lawyers ready.

Q When did you have that conversation with Tim?

A I don't remember the exact date.

Q Was it September of 2016?

A It was in September of 2016.

Q When had you made the decision to resign?

A To be truthful I thought about it before, I don't know when, always had that in mind. Never felt it was a very safe place to be in general.

Q At the time that you incorporated LinkBridge what business were you planning to commence?

A Investor relations, in which I had mentioned also to Tim, and it was recorded, and he mentioned that he would talk to Adam about it. And once they talked about it they said it was okay and wished me luck.

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Q What did you mean when you used the phrase investor relations?

A Investor relations pretty much you -- how would I describe it. I would reach out to investors so they could be introduced a specific amount of meetings to some managers in which I had also mentioned and recorded exactly what I would be doing.

Q Was it your intention in the day that you resigned to run any conferences?

A With the experience that I had in Markets Group, no.

Q So the investor relations business would that be a commission business?

A It depends on the type of investor relations. At first I had in mind it would be just commission. Later on after again getting some counsel I was able to identify in regards to charging a fee to provide those services.

Q So at the very outset it was your plan to make deals and receive a percentage of those deals?

A At first when I talked to him

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about it, but later on after I spoke with counsel I had to change that in regards to how I would get paid, but I had already quit the job technically, right, and one of the reasons why I recorded was because I obviously felt threatened by e-mail. One of the reasons why I am also uncomfortable having Tim in the same room as I am while either smiling or staring at me.

Q So you ran a conference event for the first time in May of 2018?

A Correct, May, right.

Q So at what point did you make the decision that LinkBridge would run a conference event?

A About August, September I started thinking about it, that there wasn't enough revenue coming in through investor relations. I had to sell the house to maintain myself.

Q What house did you sell?

A New Jersey.

Q Do you own your home in Florida?

A I do not.

Q When had you purchased the New

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Jersey house?

A I am sorry?

Q When did you purchase the New Jersey house?

A That same year 2016, beginning of the year somewhat.

Q While you were still working for Markets Group?

A Right.

Q When did you sell that house?

A I believe I placed it on the market November I think that same year, but I ended up selling in March, April somewhat.

Q When you made the decision to tape your conversation with Tim did you get any advice first as to whether that was legal or not?

A No, but I felt threatened for my life.

Q Have you taped anyone else at Markets Group?

A No.

Q Previous to taping Tim that day, did you tape anyone at Markets Group during

P. Oliveira

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the time that you worked there?

MR. RISMAN: Objection,

asked and answered.

You can answer it.

Q You can answer it?

A No.

Q So you never made a tape of Adam,
right?

MR. RISMAN: Objection,

asked and answered.

Q But you can answer it.

A No.

Q When was your last day at Markets
Group?

A I don't remember the exact date,
but it was September.

Q Well, after the date on which you
say you had that conversation with Tim that
you taped did you continue to work at Markets
Group?

A I did I believe for a few days, I
believe so.

Q What did you do during those few
days?

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2 A What Tim pretty much asked me to
3 just stay there, continue to oversee people
4 until they came up with a solution of who is
5 going to be head of real estate Latin
6 America.

7 Q Did they make a decision during
8 those few days as to who was going to take
9 over?

10 A I don't think they did. I
11 remember I gave suggestions, but I don't
12 remember who ended up taking the place.

13 Q So you testified that you have a
14 virtual office with a company on Avenue of
15 the Americas, has that been LinkBridge's
16 office address all along or did you have
17 another office prior?

18 A So it has been, but it wasn't
19 virtual at first.

20 Q When you say it wasn't virtual,
21 were you actually sitting there for some
22 period of time?

23 A I was.

24 Q What period of time was that?

25 A Regular business house.

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Q I mean starting when, starting right after your resignation?

A No, I believe that there was another address when I left. It was a virtual office and I think after a year or so I started being in that office and now obviously I am not around and it's a virtual office.

Q What is the name of the company and office on the Americas?

A Corporate Suites.

Q Corporate Suites?

A Yes.

Q When did you sign a contract with Corporate Suites originally?

A Maybe towards the end of -- I left '16 so maybe towards the end of '17 I would say so.

Q So the day after?

MR. RISMAN: Objection to form.

A No, it was a virtual office.

Q Yes.

A I think it was somewhere else, I

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don't remember the exact address in New York.

Q So it may not have been the place
you just named Corporate Suites it may have
been somewhere else?

A Right.

Q I am sorry, did you mention
September 16th in your testimony?

A No.

Q Do you know the date on which you
had that meeting with Tim, the meeting that
you taped?

A I answered you, I don't remember.

Q Do you know if you have produced
that tape to us in its entirety?

A I provided it to my lawyer.

MR. RISMAN: I got the full
tape on the record.

MR. WALLACE: Thank you.

I think this is a good time
to break for lunch.

(Whereupon, a luncheon
recess was taken from 1:00 p.m.
to 1:30 p.m.)

MR. WALLACE: Back on the

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record.

Q You were testifying before about the business model when you started LinkBridge was investor relations, correct?

A Correct.

Q Then later you testified that eventually you switched over to a conference model because you weren't making enough money doing investor relations; am I repeating your words back to you correctly?

A Correct.

Q Did you ever during that time period make any money doing investors relations?

A Some.

Q Can you tell me approximately how many investor relation deals you made during that time period that produced any revenue?

A I can't remember top of my head.

Q Do you know how much revenue that was, was it greater than \$20,000 in one year?

MR. RISMAN: Objection.

Asked and answered.

Q You still have to answer.

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A I don't remember exactly.

Q Do you remember which companies
you did those investor relation deals with?

A I don't remember which ones.

Q Do you remember if they were
companies that you knew from Markets Group or
companies that you developed after leaving?

MR. RISMAN: Objection to
form.

You can answer.

A Not that I remember.

Q You testified before that you had
talked to Tim and that Tim and Adam had told
you that it was okay for you to do investor
relations; is that correct?

MR. RISMAN: Objection,
mischaracterizing the testimony.
You can answer his question.

A Can you repeat the question,
please.

(Whereupon, the record was
read by the reporter.)

A Correct.

Q Did you have an understanding as

1 P. Oliveira 108

2 to what they were giving you permission to
3 do?

4 A Can you rephrase that?

5 Q What did they approve when he
6 told you it was okay to do investor
7 relations, what did they mean?

8 MR. RISMAN: Objection to
9 form.

10 You can answer.

11 A Exactly what was described on the
12 tape, reach out to investors, connect them
13 with managers.

14 Q Was it your understanding that it
15 was okay to do those kinds of deals with
16 Markets Group clients?

17 MR. RISMAN: Objection to
18 form.

19 A Can you repeat the question?

20 Q Was it your belief that you had
21 permission to call customers of Markets Group
22 to do investor relations transactions?

23 MR. RISMAN: Objection to
24 form.

25 You can answer.

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A Since it was a different business than Markets Group Tim had mentioned it was okay and he spoke to Adam about it and said it was okay as well.

Q Okay specifically to call a Markets Group client as long as you weren't doing conference business?

A Investors and managers there would be an overlap on those.

Q I don't understand what you mean by an overlap?

A They would deal with the same maybe sometimes firms that I would deal with.

Q So your answer is yes, that you believe that they were okay with your calling Markets Group clients?

MR. RISMAN: Objection,
mischaracterizes his testimony.

You can answer.

A Can you repeat that?

Q If you sold a sponsorship to somebody your last week at Markets Group, did you believe that you had permission to call that person to try and promote an investor

1 P. Oliveira 110

2 relations transaction a week after you left
3 Markets Group?

4 A According to Tim and Adam and
5 what Tim mentioned it was okay for me to do
6 investor relations with investors and
7 managers. That was not such a thing of them
8 saying you cannot do it with these people.

9 Q With the investors and managers
10 that you had done business with at Markets
11 Group?

12 MR. RISMAN: Objection.

13 Asked and answered.

14 Q You still have to answer it.

15 A Well, investors and managers, but
16 managers were the clients if that is what
17 you're asking me.

18 Q So your investor relations
19 business was to match up investors and
20 managers, correct?

21 A Right and setup meetings for them
22 specific to companies, right.

23 Q So if those managers happened to
24 be people that you had sold sponsorships to
25 at Markets Group you're saying that Tim and

1 P. Oliveira 111

2 Adam said that was all right?

3 MR. RISMAN: Objection.

4 Asked and answered.

5 MR. WALLACE: I am asking
6 again because he hasn't answered.

7 MR. RISMAN: You didn't like
8 his answer, I am sorry.

9 MR. WALLACE: It's not like
10 I don't like it I don't
11 understand it. I am asking for
12 clarification, I have a right to
13 do that.

14 A Investors and managers are open
15 to everyone on an investor relations
16 business.

17 Q The answer is yes. You're not
18 quite saying yes, but I am understanding what
19 you mean is yes, you had permission to call
20 the same people you had sold sponsorships to?

21 MR. RISMAN: Objection to
22 form.

23 You can answer.

24 THE WITNESS: He did not
25 like my answer, he did just not

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like my answer.

A According to Tim and in a conversation that we had the night I left it was okay to reach out to investors and managers to do investor relations.

Q There came a day which was the very last day that you performed any services for Markets Group.

MR. RISMAN: Is there a question?

Q Yes, there a came a day, right, which was the very last day that you performed any Markets Group services?

A Which services?

Q You testified before that after the date that you had the meeting that you taped with Tim you continued performing some services for Markets Group?

A I would say the same as before, just make sure people are hitting their metrics.

Q Right, but there was some period of time during which you were helping with the transition?

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2 A Well, they had asked me for
3 advice of who could replace me, that is all I
4 remember that we talked about.

5 Q Well, did you come into the
6 office during that period of time or did you
7 come into the office after the date that you
8 had that conversation that you taped?

9 A Yes.

10 Q Did you come into the office
11 every day after that for some period of time?

12 A I don't remember how often since
13 I had mentioned that I had to talk to
14 accountants and lawyers to set things up so I
15 am not sure.

16 Q But then there came a day when
17 were you no longer doing anything for Markets
18 Group?

19 A I am sorry?

20 Q There then came a day when you
21 were no longer doing anything for Markets
22 Group?

23 A I am not sure I understand the
24 question.

25 Q There came a day when you were

1 P. Oliveira 114

2 working full-time for yourself and for
3 LinkBridge, correct?

4 A Right.

5 Q Do you remember approximately
6 when that was?

7 A I don't remember the exact date.

8 Q You think it was a week later, a
9 day later, a month later?

10 MR. RISMAN: Objection.

11 Asked and answered. You can
12 answer.

13 A I don't remember exactly the day.

14 Q So on the first day that you were
15 full-time working for yourself and for
16 LinkBridge did you have any Markets Group
17 information still in your possession?

18 MR. RISMAN: Objection to
19 form.

20 Q You can answer.

21 MR. RISMAN: You can answer.

22 A Please read it back.

23 (Whereupon, the record was
24 read by the reporter.)

25 A No.

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Q The Excel spreadsheets that you had prepared for Markets Group did you ever bring any of them home?

A No.

Q Did you ever use a personal computer in connection with anything you did at Markets Group?

A Not that I can remember of.

Q Did you ever do any work from home for Markets Group?

A Maybe answer e-mail on my phone, which by the way it was a personal phone, but they forced us to put the e-mail on our phones.

Q During the time when you were making \$10 an hour did you have a computer at home?

A I am pretty sure I did.

Q Did you ever use that computer to access your Outlook e-mail?

A Not that I remember of.

Q Any time later during your employment with Markets Group, did you ever use a computer that you personally owned to

1 P. Oliveira 116

2 access your Outlook e-mail?

3 MR. RISMAN: Objection.

4 Asked and answered.

5 A Not that I remember of.

6 Q But it's your testimony that you
7 did use your personal cellphone to access
8 Outlook?

9 MR. RISMAN: Objection.

10 Asked and answered, you can
11 answer.

12 A Right.

13 Q When did that begin?

14 A I believe they made us do it when
15 we became full-time, so I think when we
16 became full-time they would make us download
17 the e-mail in our personal phones.

18 Q When you left Markets Group and
19 went full-time for yourself did you retain
20 copies of any Markets Groups sponsorship
21 contracts?

22 MR. RISMAN: Objection,
23 asked and answered.

24 You can answer.

25 A Not that I am aware of.

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Q Did you retain copies of any
Markets Group documentation, manuals,
brochures, any other printouts?

MR. RISMAN: Objection.

Asked and answered, he can
answer.

A Not that I remember of.

Q Did you ever while you were at
Markets Group save any information to a thumb
drive, BSD or other device?

A No.

Q Did you ever e-mail any
information to yourself?

A No.

MR. RISMAN: I just want to
stop for a second and I haven't
said anything and, Tim, I
understand you can be here, you
have the right to be here.

This is on the record that
Tim Raleigh has been staring down
the witness almost for the
entirety of his deposition and
it's becoming a problem, because

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I know my client feels threatened because of what happened to him while he was working at Markets Group and it's becoming an issue for me now. I wouldn't have said anything, I didn't say anything earlier because I thought it was going to stop. I thought it was going to be something that has lasted for a short of time, but it has lasted for hours now and I ask politely that it stop.

MR. WALLACE: For the record, the client has an absolute right to attend the deposition just as your client would have had the absolute right to attend any prior depositions. I haven't observed any interactions between them, I have not --

MR. RISMAN: That is because your speaking with the witness and I can see exactly what Tim is

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doing because he's sitting right across the table from me and it's becoming an issue and I am asking kindly that you stop doing that.

MR. WALLACE: I don't think we really have control the way our clients may feel about each other.

MR. RISMAN: Do you believe that it's appropriate to be staring down another party while they are under -- I am asking you whether you think it's appropriate, do you think it's appropriate to do something like that?

MR. WALLACE: I think that people certainly can look at each other during their testimony.

MR. RISMAN: It's different than looking and glancing over and staring down the entire time. I am not going to put up with it anymore. I want there to be a

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confirmation on the record --
don't laugh, don't smirk because
that is what your client is doing
all the time. I am asking that
you stop.

Just for the record it's
continuing on right now. I will
bring it up to the judge if it
continues or we will stop and
walk out because it's very
threatening.

MR. WALLACE: Can you read
back my last question?

MR. RISMAN: Objection to
form, form objection.

Q So let's talk about the six month
period after you went full-time working for
yourself, did you have other people working
with you during that period of time?

A Yes.

Q Who were they?

A It was Naira and again
freelancing Claudio.

Q You mentioned earlier a different

1 P. Oliveira 121

2 freelancer I think was named George?

3 A Correct.

4 Q So George didn't work for you in
5 the first six months?

6 A No.

7 Q But Claudio did?

8 A On and off.

9 Q Claudio you said is in Brazil?

10 A Correct.

11 Q Do you recall when after you went
12 full-time you first contacted Claudio?

13 MR. RISMAN: Objection to
14 form.

15 A I don't remember.

16 Q When you first contacted Claudio
17 what did he do for LinkBridge?

18 A I asked him to build lists, send
19 e-mails whenever he was available.

20 Q He was also working in Latin
21 America, looking for leads in Latin America
22 as you had done in Markets Group?

23 MR. RISMAN: Objection to
24 form.

25 You can answer.

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A Can you rephrase that question?

Q Yes, sure.

What instructions did you give him as to what kind of information to search for?

A Any type of manager investor.

Q Located specifically in Latin America?

A I don't remember specifically what he would focus on or what I needed to focus on in terms of regions.

Q Was he performing any services for you at the outset that were different than the work that you did when you were a \$10 an hour employee for Markets Group?

A I am going to need you to read that back for me.

(Whereupon, the record was read by the reporter.)

A I am not sure I understand which service, I am not sure of your question.

Q Was he doing for you he basically the same tasks that you did for Markets Group when you started?

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MR. RISMAN: Objection to

form.

You can answer.

A Well, he would build lists and he was able to send e-mails probably not necessarily the same.

Q Did he make any phone calls for you?

A I allowed him to make -- I don't remember when exactly I allowed him to make a few calls.

Q Those first six months did LinkBridge have a particular product or service you were offering potential clients?

MR. RISMAN: Objection to

form.

You can answer.

A We were -- I was just doing investor relations.

Q During that period of time did you have phone conversations with potential clients yourself?

MR. RISMAN: Objection to

form.

1 P. Oliveira 124

2 Q Do you ever use the phrase value
3 proposition?

4 A Not that I can remember of.

5 Q Ever refer to an ask in a
6 conversation?

7 A I am sorry?

8 Q In a sales conversation do you
9 ever speak of an ask?

10 A An ask?

11 Q An ask?

12 A I am not sure I understand.

13 Q When you had a telephone
14 conversation with a potential client what
15 specifically did you offer them?

16 MR. RISMAN: Objection to
17 form.

18 A Investor relations.

19 Q I am sure that you didn't just
20 call up a client and say, "Can I do investors
21 relations for you?", it was more specific
22 than that, wasn't it?

23 MR. RISMAN: Objection to
24 form.

25 You can answer.

P. Oliveira

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A I guess it would be more on if they had an inhouse investor relations team.

Q For example, were you offering to sell them sponsorships during that six month period?

A No.

Q Were you offering to sell them tickets to anything?

A No.

Q So what specifically were you offering to sell them?

MR. RISMAN: Objection, asked and answered.

MR. WALLACE: There wasn't an answer.

MR. RISMAN: Yes, there was. He talked about investor relationship and he defined it before and you keep going on about it. You don't like his answer.

MR. WALLACE: It's that I don't understand his answer. You have to answer these questions

P. Oliveira

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despite the objections.

Q When I make a sales call to somebody I don't call them up and say may I offer you sales, right? I call somebody up and I say may I sell you oranges, water, coffee, folders. I am going with a product, right, what was your product during that six month period?

MR. RISMAN: Objection to form.

You can answer if you understand what he's saying.

A There is no product, investor relations isn't a product.

Q So I could call somebody up and try to sell them legal services, I could try to sell them accounting services, I could try to sell them money management services, what specific service were you offering to clients during that six month period?

MR. RISMAN: Objection, asked and answered.

A I am not sure I understand your question, but it was exactly what I told Tim

1 P. Oliveira 127

2 that I would be selling, which is connecting
3 investors and managers, investor relations.

4 Q When we refer to a potential
5 client we are talking about investors or
6 managers or both?

7 A Clients, managers.

8 Q Were you making a proposal that
9 you would introduce managers to investors?

10 A Right, a specific amount of
11 meetings.

12 Q How many meetings?

13 A It all depends.

14 Q Were they paying you just for the
15 introductions?

16 A Yes, and if they needed some help
17 on a marketing material for themselves.

18 Q Marketing material to show those
19 investors?

20 A Or for themselves to show their
21 company.

22 Q In order for LinkBridge to get
23 paid, did an investor actually have to invest
24 in the client?

25 A As mentioned previously, no, as I

P. Oliveira

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1 searched legal counsel so they can actually
2 pay a fee.

3
4 Q So they would pay a fee for,
5 let's say, twenty introductions even if none
6 of those people actually invested?

7 A In some cases.

8 Q If somebody did make an
9 investment would LinkBridge also get a
10 commission on the investment?

11 A I had answered and it's no.

12 Q So during that six month period
13 Naira was working for the company?

14 A I am sorry?

15 Q Naira was working for the company
16 during the six month period?

17 A Not that I can remember of.

18 Q I am referring to your wife, did
19 I get her name wrong?

20 A No, you got it right.

21 Q So when did she start performing
22 services for LinkBridge?

23 A I don't remember exactly when,
24 she would just give me some help sometimes.

25 Q Was she a partner in LinkBridge

P. Oliveira

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on the day that you formed it?

A I don't remember, but I don't think so, but I do not remember.

Q Did you draw up at any time any kind of a shareholder or operating agreement for LinkBridge?

A What do you mean?

Q Do you have a contract that governs among the owners of LinkBridge, that deals with their relationship with each other as owners?

A None that I can remember.

Q Is there anybody else who is an owner of LinkBridge?

A When?

Q At any time?

A I'd have to check.

Q Does LinkBridge have any outside investments?

A I am sorry?

Q Does LinkBridge have any outside investors?

A Can you specify?

Q Yes, did anybody ever put money

P. Oliveira

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into LinkBridge to finance operations?

A No.

Q Did you borrow any money to finance operations of LinkBridge?

A No.

Q LinkBridge has a website today, right?

A Yes.

Q What is the website address for LinkBridge?

A LinkBridgeinvestors.com.

Q So when did you purchase that domain?

A I don't remember exactly when.

Q When did you first put up a website at that domain?

A I don't remember exactly when.

Q Was it in 2016?

A Yes.

Q Did it describe the investor relations business?

A Yes.

Q When did George start performing services for LinkBridge?

1 P. Oliveira 131

2 A That was towards the end of '17,
3 towards the end of 2017.

4 Q What does George do?

5 A He's an independent contractor,
6 freelancer, sells sponsorships whenever he
7 wishes to.

8 Q Does he build lists in Excel?

9 A Yes, he does as well.

10 Q So another way of phrasing it
11 he's responsible for generating his own
12 leads?

13 A Yes, unless I find again another
14 publically available list by doing the first
15 name, last name, at company name or an Excel
16 S, Excel, ready to go.

17 Q Does Claudio do any sales today?

18 A No.

19 Q So Claudio is exclusively finding
20 information, George is doing sales?

21 MR. RISMAN: Objection,
22 compound.

23 You can answer.

24 THE WITNESS: Which one?

25 MR. RISMAN: I guess both,

P. Oliveira

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you want to split them up?

Q What does Naira do?

A She does some marketing materials.

Q Does she design the website?

A I did some, she did some.

Q Did you use anyone in the outside to design the website?

A No, no.

Q Other than the people we have named and lawyers or accountants have you ever hired anyone else to perform any services for LinkBridge?

MR. RISMAN: Objection to form.

You can answer.

A Have I had any other freelancers?

Q Let's start with that question, any other freelancers?

A Yes.

Q Who?

A Vivian.

Q Spell it, please?

A V-I-V-I-A-N.

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Erin.

Q Can you tell me Vivian's last
name?

A Fonseca, F-O-N-S-E-C-A.

Erin.

Q A-R-I-N?

A E-R-I-N.

Q Last name?

A I am not sure if I am spelling it
correctly, I think it's V-A-D-A-L-I-A.

Q Anyone else?

A I don't think so. Those are the
only ones that I can remember.

Q Where is George based?

A Here in New York.

Q What did Vivian Fonseca do for
the company?

A Not much, also freelancer, worked
whenever she wanted. I would ask her to
build lists, send e-mails.

Q What about Erin?

A That was even less, similar.

Q Do either of them still work for
the company today?

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A No.

Q Is there a reason for that?

A They were freelancers, they came as they pleased, weren't selling, no money coming in.

Q Were not selling?

A What?

Q Were not selling?

A No.

Q So there came a time when you scheduled your first conference event for May of 2018?

A Right.

Q When did you first begin to make sales for that May 2018 event?

A Beginning October of -- I believe that was beginning of October for 2017, towards the -- well, towards the end of September as well from what I remember.

Q Did there come a time when you first mentioned the event on your website?

A Yes, the conference I believe it was published on beginning of October, I am not 100 percent sure of the date.

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Q Where did that event take place?

A Here, here in New York.

Q In what space?

A At the Harmonie Club.

Q What is the Harmonie Club?

A It's a club.

Q Private club or restaurant, a
nightclub?

A Private club I believe so, I
believe it's a private.

Q Did you sign a contract with the
Harmonie Club for the use of the space?

A Yes.

Q When did you sign that contract?

A It was either August, September,
I am not 100 percent sure.

Q What else did you do in August or
September in preparation for your conference?

A Anything specific you want to
ask?

Q Anything at all?

A Searched through venues, which I
focused on the vendors, AV, investors, some
-- that is pretty much all I can -- so if I

1 P. Oliveira 136
2 remember just the tools to, you know, for the
3 conference itself.

4 MR. WALLACE: Read that back
5 to me.

6 (Whereupon, the record was
7 read by the reporter.)

8 Q Let me ask a followup question
9 about that, you mentioned vendors.

10 A Right.

11 Q What vendors were associated with
12 the conference?

13 A AV, catering, chairs, if it need
14 to be.

15 Q AV, do you mean audiovisual?

16 A Correct.

17 Q What audiovisual requirements did
18 you have for a conference?

19 A I personally did not have any
20 requirements, I went with what they
21 suggested.

22 Q What did they suggest?

23 A Screens, speaker, microphone.

24 Q Did you sign any contract for
25 audiovisual or catering?

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A I believe -- so the catering I believe I signed with the venue. The audiovisual I do not remember if it was with the venue by itself, I do not remember.

Q Did there come a time when you put together a schedule of speakers for that conference?

A Right.

Q When was that?

A Speakers as in investors let's make that clear, that is very different than managers and sponsors. Around, I would say, maybe late August, late August, September, yeah, I would say so, probably September-ish.

Q Did you sell sponsorships for that conference?

A I am sorry?

Q Did you sell any sponsorships for the conference?

MR. RISMAN: Objection,
asked and answered.

You can answer.

A Yes.

Q When did you start selling

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sponsorships?

MR. RISMAN: Objection,

asked and answered.

You can answer.

A Again it was October towards the end of September.

Q Did you make any delegate sales for that conference?

A I did.

Q When did you begin making those delegate sales?

A Around the same time.

Q September?

A End of September beginning of October. The website -- the website wasn't up yet, so I am assuming once the website was up like October.

Q Did you use any outside software to accomplish registrations for the conference?

A Outside software, not that I can remember of.

Q When somebody wanted to register for the conference did they do that on your

P. Oliveira

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website?

A They could do it on the website,
yes.

Q Did they go to a third-party
website to do that?

A Not that I am aware or I wouldn't
know. You go on our website and you can
register.

Q So I have asked you a series of
questions about sales for that conference,
when did you start making the outreach that
led to those sales?

MR. RISMAN: Objection,
asked and answered.

A Right around the same end of
September, beginning of October.

Q Did you find most of the sponsors
for that conference personally?

A I can't remember exactly since I
mean I would -- I would build lists, Claudio
would build lists, George was building lists,
so I don't know where it came from. Again
lots of overlaps. If lists are found, you
know, whenever they are found online if I

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type first name, last name and a company I am able to download in Excel on google. Maybe somebody also did the same and reached out to the same person.

Q Were some of the sponsors for the May conference people that you had sold sponsorships to at Markets Group?

A Not that I can remember having a specific case.

Q Do you remember if any of the people that you sold sponsorships to for the May conference were people that you had never dealt with at Markets Group?

MR. RISMAN: Objection to form.

You can answer.

A Read that back to me.

(Whereupon, the record was read by the reporter.)

A I don't remember them all, I don't remember them all, but -- I don't remember. I mean specific case if you have a company, but not like I remember. Outreach is outreach, whoever answers.

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Q What is your title in LinkBridge,
do you call yourself the CEO or the
president?

A Yes, founder CEO.

Q What is Naira's title?

A Principal.

Q What were LinkBridge's revenues
for 2018?

A I can't remember the top of my
head.

Q Approximately?

A Approximately I can't remember
exactly.

Q Do you know if you made more than
one million dollars?

A I wouldn't know off the top of my
head.

Q Does LinkBridge maintain any
other offices or virtual offices other than
the one that we talked about?

A I don't know if I still have it,
an office -- I have a virtual office in
Orlando if I would ever have meetings around
there, but I don't know if I still maintain

P. Oliveira

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it I have to check.

Q Did you ever maintain an office
in Latin America anywhere?

A No.

Q So when you're in Florida do you
and Naira work from home?

A Yeah, most of the time.

Q We were talking before about any
freelancers or outsiders that you used, have
you ever hired a firm to do any -- not a
freelance individual, but a company to do any
lead generation?

A Have I ever hired any company,
umm, I don't remember exactly, but I believe
I did with Preqin.

Q Who is Preqin?

A I am uncertain where they are
because I think they do research and they
also sell lists so that is what I would
describe it as.

Q What business did you do with
them?

A Purchased, I don't remember
exactly, but maybe 100,000, 90,000, I am not

P. Oliveira

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sure, leads or so.

Q When was that?

A I don't remember off the top of my head exactly when.

Q Was it before or after that May of 2018 event?

A I believe it was before. I think one of the main reasons I purchased was actually to sell for the conference.

Q Have you made any purchases from Preqin since then?

A I don't think so, I don't remember.

Q Were you unhappy with that list?

A Not at all.

Q You felt it was money well spent?

A I guess it was just an addition.

Q Well, as you sit here today do you know if you made any sales from leads developed from that list?

A I would not know. Again I mean like I said, find list, build list, get list, combine list, e-mail, whoever bites bites.

Q Does LinkBridge have a budgetary

P. Oliveira

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process?

A Would you mind rephrasing that?

Q Do you create budgets that indicate how much money you want to spend in different areas of the business?

A No, although we should have, but no.

Q Other than Preqin have you ever bought any lists from any outside companies?

A Not that I remember of.

Q Have you ever hired an outside company to do any marketing for you?

A No.

Q Other than purchasing lists, have you ever hired any outside company to do any other sales for you?

A No.

Q Have you or LinkBridge been a party to any other litigation?

A No.

Q You referred specifically to reaching out to investors to come to that May 2018 conference, what is the importance of getting investors to a conference?

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A They are just as important as food.

Q What do you mean by food?

A They are just a tool to be there.

Q Do the investors pay LinkBridge any money to attend the conference?

A They do not.

Q Do the investors help LinkBridge attract sponsors to a conference?

A I don't think -- so are you asking me can I sell without investor's sponsorship, yes.

Q Why bother to invite the investors to your conference?

A It's an extra tool, I mean we have lawyers, accountants.

Q Do you invite lawyers and accountants to conferences for free?

A No.

Q So when you call an investor a tool, a tool is something that accomplishes something, right, you do something with a tool?

A Right, but the way it works you

1 P. Oliveira 146

2 invite them, you don't want to talk to them
3 again until the conference because they will
4 probably not even remember who you are. As
5 the same way you may have a list with lots of
6 people and only ten percent, twenty percent,
7 thirty percent show up, so I don't count on
8 them to make these sales.

9 Q Do delegates buy tickets in order
10 to meet investors?

11 A Not necessarily.

12 Q Why not charge money to the
13 investors then?

14 A They wouldn't pay. I mean they
15 don't come for free, whenever, sometimes they
16 do when they do. So if I charge them they
17 would not come at all.

18 Q In that case why would you care
19 if they didn't come?

20 A I don't.

21 Q Have you ever solicited any
22 Markets Group employee to come and work for
23 you?

24 MR. RISMAN: Objection.

25 You're asking for a legal

P. Oliveira

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conclusion. You can answer.

Q Have you ever talked to a Markets Group employee about going to work for you at any time?

A Not that I can remember of.

Q In the conversation that you tape recorded with Tim I think you referred to Will and Frank.

A To Will Frank?

Q Will and Charles, did you refer to Will and Charles in that conversation?

A Yes.

Q Why did you refer to Will and Charles in the conversation?

A I don't remember exactly, but from what I remember Tim and Adam were afraid that Will and Charles were bringing people to work for them.

Q Who were Will and Charles?

A They used to be managers of Markets Group and they are running conferences competing directly with Markets Group.

Q Is Will the same Will that you

P. Oliveira

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referred to as having been your manager at
one point?

A Yes.

Q So why was it important to bring
up Will and Charles in your resignation
meeting?

A I don't remember exactly, but
when I recorded the conversation we actually
had a conversation before that I had
mentioned to Tim and we talked to Adam about
it, so when I recorded -- and then I recorded
it. Now, maybe Will and Charles was brought
up in the first conversation I do not
remember. What I remember is that they were
unhappy that they were taking people out of
Markets Group and they had mentioned to -- I
don't remember exactly, but I think they
wanted to sue them. I don't think it was
Will and Charles specifically, but the people
who leave just to jam them up and pressure
them, therefore, I would probably say that is
why Will and Charles was brought up.

Q What did you use to tape that
conversation?

P. Oliveira

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A I am not sure, if I remember I think it was my phone.

Q When did you decide that you were going to tape that conversation?

A I believe it was when I was feeling threatened by Tim.

Q Did you decide that you were going to tape that conversation the day before, a week before, the morning of?

A I don't remember exactly when.

Q Did you plan in advance exactly what you wanted to talk to Tim about on the tape?

A Not that I remember.

Q Did you speak to anyone or get any advice about what to ask Tim on the tape?

A No.

Q Did you ever regard yourself and Tim as being friends?

A I would say so, hence he caught me by surprise the e-mail, the threats, the lawsuit or as I mentioned previously by my counsel even the way he's acting now.

Q Did you socialize with Tim

P. Oliveira

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outside the office?

A I did and on that first year that I was running LinkBridge Tim asked me a few times to go have a beer with the whole Markets Group team and actually to play volleyball. I think they were running a Friday something for volleyball.

Q Did you go for a beer?

A I don't think I did.

Q Did you play volleyball?

A No.

Q Do you ever talk to Roy Salsinha today?

A No.

Q When was the last time you spoke to Roy?

A I don't remember, I lost touch with lot of people.

Q When did you lose touch with Roy?

A I am not sure, I don't remember when exactly.

Q Did you ever talk to Roy after you left Markets Group?

A Yes, I believe so.

1 P. Oliveira 151

2 Q Were you aware that Markets Group
3 sued Roy?

4 A I think that is exactly why I
5 believe so, because my counsel had mentioned
6 not to touch base with him, but I don't
7 remember exactly when that was.

8 Q Since you have been working for
9 yourself at LinkBridge have you ever done any
10 business with Roy Salsinha?

11 A No.

12 Q Have you ever discussed any
13 business with him?

14 A No.

15 Q Has he ever discussed any with
16 you?

17 MR. RISMAN: Objection,
18 asked and answered.

19 You can answer.

20 A No.

21 Q Did you base your website on
22 Markets Group?

23 A No.

24 Q Did you base your event brochure
25 for the May 2018 event on Markets Group'

P. Oliveira

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brochure?

A No, they are all very similar, if you look across, I don't know, IMN, Terapin, GRI, ILPA, PRE, PEI, amongst a bunch of others they are all fairly the same.

MR. WALLACE: Let's take a quick break.

(Whereupon, a recess was taken at 2:51 p.m. to 3:00.)

Q Did the event in May of 2018 take place?

A Yes.

Q Would you call it a successful event?

A I would say it was okay.

Q What do you mean by okay?

A It was okay.

Q Do you know if you made money or lost money on it?

A I am not aware of it.

Q Do you keep financial statements for LinkBridge?

A What type of financial statements exactly?

P. Oliveira

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Q Do you have any outside
accounting firm?

A Yes.

Q Do they prepare a profit and loss
statement for LinkBridge?

A Yes.

Q Do they prepare that report
annually or more often than annually?

A Annually.

Q Do you keep any records of
LinkBridge which indicate the revenues from
an individual event?

A Somewhat, not the way we should.

Q Well, could you clarify what you
mean by somewhat?

A I do not always add everyone that
I sold a sponsorship to.

Q Is that a record you keep
yourself?

A I just answered I do not always
keep it.

Q Is that an Excel spreadsheet?

A Some of them.

Q The ones that aren't Excel

P. Oliveira

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spreadsheets what are they?

A I have to go back and look for them.

Q But would that same document also include the expenses from an event?

A I haven't got to that yet.

Q Were you able to pay all your bills from the May 18th event?

A Yes.

Q Did you pay any commissions to your freelancers from the May 2018 event?

A Some.

Q How many other events has LinkBridge completed since that May of 2018 event?

A Two more.

Q Do you have other events that are presently planned for the future?

A Only two.

Q Are those events both presently scheduled?

A Yes.

Q Do you have contracts with a venue for those events?

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A Yes, for June. I am not sure about the other one.

Q Are they similar to the May 2018 event?

A The one in June I would say so.

Q What about the other one?

A There are somewhat similar to the other two.

Q What do you mean similar to the other two?

A The ones that you asked me.

Q Are the other two events different in some way than May of 2018?

A It's one day instead of two days.

Q Is LinkBridge currently selling any investor relation services?

A None that I can think of right now.

Q Did LinkBridge attempt to sell any investor relations during 2018?

A I don't remember, none that I can remember unless I dragged the conversation from investor relations point, but I don't remember talking about that.

P. Oliveira

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Q Do you know if LinkBridge ever again tried to sell investor relations after first scheduling the May 2018 event?

A I just answered I am not sure not off the top of my head.

Q Do you believe that you have any kind of a financial claim against Markets Group?

MR. RISMAN: Note my objection, calls for a legal conclusion.

You can answer.

A I am not sure, but I was not, you know, paid for the last two weeks from what I can remember. I am not 100 percent sure.

Q Other than that, is it your claim as you sit here today that Markets Group broke any promise to you?

A Wow, I was promised a bonus, never received it, argued about it. They said -- Adam said look how much your salary increased, kind of wanted to make more money and sell US, they promised, never allowed me to because of the same reasoning

P. Oliveira

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Portuguese/Spanish. I don't know, I guess it was just a lot of stuff, you know, that would go on and we didn't have much HR at the time. You know, things happened, but I sat there.

Q So you said a couple of things I didn't understand. You referred at one point to Portuguese/Spanish, I wasn't sure what you meant by that.

A That is one of the reasons why they didn't let me run the US Market although they promised they would.

Q And then -- I am sorry, were you done, did you finish?

A And then they just asked me to focus on Latin America.

Q Then you said something about making more money and I didn't understand the words that you said right after that.

A That they told me they were going to give me a bonus at the end of the year and I came to talk about it and Adam said, you know, you got a great increase of salary, something like that.

Q What specifically were you

P. Oliveira

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promised about a bonus?

A How much?

Q Did they promise you a specific amount?

A They didn't promise a specific amount.

Q What was that bonus to be based on?

A I guess that was just something for the managers, you know. Others would receive it, one of the reasons why I decided to be a manager was cause everyone received it.

Q Was that promise made before you got the increase?

MR. RISMAN: Objection to form.

You can answer.

A That has nothing to do with one another, although I don't remember.

MR. WALLACE: Please mark this as Plaintiff's Exhibit 1.

(An Excel list was marked as Plaintiff's Exhibit 1, for

1 P. Oliveira 159

2 identification, as of this date.)

3 Q Ready?

4 A Yes.

5 Q Sir, I am showing you for
6 identification a document that's been marked
7 Plaintiff's Exhibit 1, can you tell me what
8 that is?

9 A It's an Excel list.

10 Q Do you know if you have seen this
11 specific Excel list before?

12 A Not that I remember.

13 Q So if you look at the very first
14 column under company where it says 1875, does
15 that number mean anything to you?

16 A No, not that I can remember.

17 Q So if you read down it says in
18 the second line Abbott Downing, was Abbot
19 Downing the name of a company that you did
20 business with?

21 A I am not sure.

22 Q On this first page do you
23 recognize the names of any companies?

24 A Well, I think it's very broad,
25 just companies maybe BNY Melon, it's a large

P. Oliveira

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firm. Off the top of my head no.

Q So in the second column where it has a name like Tanya Marston, do you know what name that would be, what that would be the name of?

MR. RISMAN: Objection to form.

A No. What do you mean, do I know who Tanya Marston is, what is the question?

Q Where the names are listed in the right hand column, in terms of their positioning does that mean anything to you as to what information that would convey in the list of names?

A I don't think I understand the question, are the names there, the names are on the list, okay.

Q Whose names are those?

A I don't know, how would I know?

Q Looking in the upper left-hand corner of that page where it says Andes, what does that mean to you?

A That is a Latin America conference that we ran in Columbia.

1 P. Oliveira 161

2 Q Does this appear to be a list of
3 leads from that conference?

4 MR. RISMAN: Objection to
5 form.

6 You can answer.

7 A I don't remember.

8 Q You testified about building
9 Excel spreadsheets from publically available
10 information, does this appear to be one of
11 those Excel spreadsheets for the information
12 it contains in the format?

13 A I am not sure, it could be. A
14 lot of empty spots, info at LinkedIn two,
15 three, I don't know, I would not know.

16 Q When you turn to the last page of
17 this document do you see some writing there?

18 A Yeah.

19 Q Is that in Spanish or Portuguese?

20 A That's in Spanish.

21 Q Starting with the first full
22 sentence there which begins Si, No, can you
23 translate that for me?

24 A If it doesn't answer invite
25 someone else.

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Q What is the next sentence?

A Come back July 8th.

Q Do you think you might have made
that note?

A No, I don't think so.

Q Did you ever take notes in
Spanish?

MR. RISMAN: Objection to
form.

A Not that I remember, but I highly
doubt it.

Q Who working at the company would
have taken notes in Spanish?

A I have no idea, it's too broad.
It's like info at and a lot of gaps.

Q I am pretty sure that you
testified before that after you had
conversations with clients you didn't add any
notes about them to the Excel spreadsheets.

MR. RISMAN: Objection to
form.

You can answer.

MR. WALLACE: I haven't
asked the question yet.

P. Oliveira

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Q Does this refresh your
recollection about adding notes to Excel
spreadsheets?

MR. RISMAN: Objection to
the form.

A Not that I can remember.

Q Is it still your testimony that
you never personally added a note to an Excel
spreadsheet?

MR. RISMAN: I am going to
object on the record that it's a
mischaracterization of his
earlier testimony, but you can
answer.

A Not that I am aware of.

MR. WALLACE: Mark this as
Plaintiff's Exhibit 2, please.

(Resignation e-mail was
marked as Plaintiff's Exhibit 2,
for identification, as of this
date.)

Q Is that the e-mail that you sent
resigning from the company?

A That is the e-mail.

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Q So when you sent the e-mail had you previously told anyone at the company that you were quitting?

A Tim.

Q So you had told him that you were leaving before you sent the e-mail?

A Yes, as a matter of fact I don't remember when exactly, but I told him before.

Q How long before you don't remember?

A No.

Q Did you send this e-mail after the conversation in which you taped him?

A I don't remember exactly.

Q You might have sent it afterwards?

MR. RISMAN: Objection, asked and answered.

You can answer.

A I am not certain.

MR. WALLACE: Mark this as Plaintiff's 3, please.

(A document pertaining to LinkBridge was marked as

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Plaintiff's Exhibit 3, for
identification, as of this date.)

MR. RISMAN: For the record
this is a date stamped document
D10.

On the record, Jonathan, has
this document been exchanged?

MR. WALLACE: I don't know,
I am not sure.

MR. RISMAN: You don't know
if you have exchanged this
document. Maybe your partner can
tell me whether this document has
been exchanged because there is
no date stamp on it and it's two
pages.

Has it been exchanged with
us?

MR. WALLACE: It's public
record that we pulled off his
corporation.

MR. RISMAN: We wanted it
prior to the exchange if you
intended on using it at the

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2 deposition in advance of it.

3 MR. WALLACE: Your objection
4 is noted.

5 Q This is your corporation, right,
6 LinkBridge Investors?

7 A Yes.

8 Q Do you remember the date that you
9 started the process of incorporating it?

10 A Most likely when I first spoke
11 with Tim since it was a fifteen minute thing,
12 twenty minute, I don't know.

13 Q How did you go about
14 incorporating it, did you use a service?

15 A I don't remember.

16 Q When you say it's a fifteen
17 minute thing, you mean it takes fifteen
18 minutes to incorporate?

19 A I would say so, I don't think
20 it's something long, I am not sure.

21 MR. WALLACE: Mark this as
22 Plaintiff's 4.

23 (An e-mail from Naira to
24 Eric Newman was marked as
25 Plaintiff's Exhibit 4, for

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2 identification, as of this date.)

3 Q I am showing you for
4 identification what has been marked as
5 Plaintiff's 4.

6 MR. RISMAN: Can you give
7 the witness the opportunity to
8 review the document that was just
9 handed to him.

10 MR. WALLACE: Absolutely,
11 sure.

12 Q Are you ready?

13 A Yes.

14 Q I am showing you what has been
15 marked as Plaintiff's 4 and this is
16 Defendant's bate stamped document pages 00999
17 through Page 01049. I'd like you to look at
18 page 01017, please.

19 A Okay.

20 Q So if you look halfway down the
21 page there is an e-mail from Naira, am I
22 pronouncing her name correctly?

23 A Yes.

24 Q You testified that Naira is your
25 partner and your wife, correct?

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A Correct.

Q So there is an e-mail from --

A Well, I am not sure if she is a partner. I have go back and look at it as I mentioned previously.

Q Well, she is writing from a LinkBridge Investors.com address, right?

A Right.

Q The e-mail we are looking at is September 6, 2017.

A Correct.

Q It's to Eric Newman.

A Sure.

Q Who is Eric Newman?

A An investor.

Q If we look above there is a reply from him on September 7th. His title is he's a CPA with the City of Stanford in Connecticut, do you see that?

A Yes.

Yes, I see that.

Q So the City of Stanford was considered to be an investor using the definitions you gave us before, right?

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A That is correct.

Q On September 6, 2017 Naira was reaching out to confirm that Eric would be attending as an investor.

MR. RISMAN: Objection to form.

MR. WALLACE: I am asking him if I am interpreting the e-mail correctly.

Q You can answer.

A No, she is not asking to confirm. She just sent a cold e-mail and he bit it.

Q She sent a cold e-mail on September 6th and he responded the next day that he would like to come?

A Right.

Q So because he was an investor would he have paid for the conference or he would have attended for free?

A He would have attended for free.

Q In her e-mail, her cold e-mail as you described it of September 6th she gives a pretty long list of other participants in the meeting starting with Alameda County

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Employees Retirement Association; do you see that?

A Yes.

Q It runs down through a bunch of names down to the next page and ends in Wilshire & Associates.

A Okay.

Q Were these companies' investors?

A Yes.

Q Take a moment and look at the list and see if you see anybody there who is a sponsor or a delegate.

A No.

Q So all investors, correct?

A Correct.

MR. RISMAN: Objection,

asked and answered.

Q So on September 6th when she sent this cold e-mail, is it your understanding that all of these investors had in fact been previously contacted and confirmed for this event?

A Not that I can remember, but I don't know.

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Q I am sorry, are you saying that it does or doesn't contain names of people who had been confirmed for the event?

MR. RISMAN: Objection, asked and answered.

You can answer.

A Not that I remembered.

Q Well, is it possible that in the e-mail she sent on September 6th she was stating that companies that were participating that in fact were not participating?

MR. RISMAN: Objection to form.

You can answer.

A This could have been -- this could have been someone who just asked to pencil in not fully confirmed. As mentioned previously, take those people that talked to them or there is an e-mail, they say pencil in, I am not sure. You don't talk to them and when you go to the conference more than half are missing.

Q Could this list include anybody

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who had never been contacted?

A Not that I am aware of.

Q Given this fairly long list of people that are already listed as attending, does that refresh your recollection as to when you started investor outreach for this event?

A Not necessarily, but as you can see an e-mail was sent out that day and the next day they answered, so could have taken these people ten minutes, two minutes to answer an e-mail right away and say yes.

Q Is that a common occurrence that somebody answers even the next day?

A Well, if they answer sometimes they even answer in the next minute, but again it's whoever bites bites.

MR. RISMAN: Hasn't it already been marked?

MR. WALLACE: So is the resignation letter.

MR. RISMAN: Why are we not doing that?

MR. WALLACE: It's not going

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to come up that much and I wanted
in my own list.

Mark this as Plaintiff's 5.

(A printout from
LinkBridge's website was marked
as Plaintiff's Exhibit 5, for
identification, as of this date.)

Q Showing you a document that's
been marked Plaintiff's 5, contains
defendant's bate numbers 44 to 54, have you
seen this document before?

A Have I seen the website before?

Q Can you tell me what this is that
you're looking at?

A The website.

Q Your testimony is this is a
printout from your website site, correct?

A Correct.

Q This is the description on your
website of the event we have been you talking
about in May 16th and 17, 2018?

A Correct.

Q In addition to putting it up in
this format on your website site, did you

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print any paper brochures or any marketing materials related to this event?

A Did I print a brochure for the event?

Q Yes.

A Yes.

Q How was that brochure distributed?

A During the event?

Q You're talking about a program for the event?

A Right.

Q Did you have any kind of marketing materials other than the website page, any marketing materials that were printed on paper in advance of the event?

A I mean a PDF you're asking printed is different, I don't know if people would print.

Q Well, if you were on the phone with somebody talking to them about this event in advance, did you ever send them something in the actual paper mail about the event?

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2 RISMAN: Objection.

3 You can answer.

4 A Not that I am aware of.

5 Q If they wanted more specifics did
6 you refer them to the website page?

7 MR. RISMAN: Objection to
8 form.

9 You can answer.

10 A I am not sure I understand the
11 question, what are you asking me when I am on
12 the phone with someone?

13 Q You testified a couple of times
14 that you sometimes at Markets Group would
15 send -- 10,000 to 20,000 e-mails would go out
16 a time about an event; do you remember saying
17 that?

18 A Okay.

19 Q Did you ever at LinkBridge send
20 any paper mail, any United States mail to
21 anyone, did you do any direct mail about an
22 event?

23 A Not that I can think of.

24 Q So if you look towards the bottom
25 of the first page it lists Daniel Daniello

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from the Carlyle Group; is that investor?

A In my opinion I would say so.

Q Are there any sponsors that are listed in this exhibit?

A Well, it says sponsors there.

Q On Page 48, correct?

A I don't have a number on the page. Forty-seven it starts the platinum and then 48.

Q Are what platinum sponsors?

A Just a fancy name for these who may have closed -- who may have may have closed quicker. Maybe they paid a little bit over others, but there isn't a big difference I can think of off the top of my head, maybe they paid a little more.

Q How much did somebody pay to be a platinum sponsor?

A I can't be certain, it varies.

Q Can you give me a range?

A I can't, it's very broad. It depends on the firm I guess.

Q Well, to your recollection what is the least anyone ever paid to be a

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1 sponsor?

2
3 A To my recollection I am not sure,
4 I would have to go back and look.

5 Q Do you remember the most that
6 anybody ever paid to be a sponsor?

7 A I would say it's the same answer
8 as before. I am not sure, I'd have to go
9 back and look.

10 Q So before being listed on these
11 pages as a platinum sponsor or sponsors would
12 each one of these companies have signed a
13 contract with LinkBridge?

14 A To be a sponsor the majority.

15 Q Had all these companies been
16 contacted in order to be listed here?

17 A I would say so.

18 Q As you look on this list can you
19 identify any companies that didn't pay for
20 sponsorship? I am talking about just the
21 ones that are listed as sponsors.

22 A Blackstone.

23 Q Blackstone never paid?

24 A Correct.

25 Q Were they supposed to?

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MR. RISMAN: There was like an open question, you asked him about all of them. Are you going to give him an opportunity to answer about all of them and ask him about individual ones. He didn't have an opportunity to answer, you just jumped into the next question.

Q Was Blackstone supposed to pay?

A That is a very tough question to answer because people see them differently. They can be an investor, they can be a manager, they can be a fund to fund. There are a lot of products inside a firm.

Q What I am asking is Blackstone did you expect them to pay and they did not?

A From what I remember I am not 100 percent sure, but I think I tried and they didn't want to pay I guess. I don't remember exactly, but then I accepted to add them there.

Q Did they attend the conference?

A Yes.

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Q Following on, do you see anybody else on the list of platinum sponsors or sponsors that did not pay?

A Do you have a firm in specific, I can't remember.

Q I am only asking if you remember, you remembered Blackstone. Is it your testimony that you don't remember anybody else on this list not paying?

A Blackstone was the first one there. I believe Stepstone because they also have a fund to fund.

Q What's the word you're using?

A Fund to fund, which is also an investor.

Q Fund a fund?

A Fund to fund. Those are funds that are allocating to funds as well so they have some different arms internally.

Q So Stepstone might not have made paid anyone else?

A I don't think they did.

Q Anyone else?

A None that I can think of.

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Q Did Vivaris pay?

A So Vivaris was supposed to pay for investor relations. They didn't pay, they dragged me along for maybe a year. They were supposed to pay me, I don't remember exactly the amount, but then I ended agreeing for them to pay half if they would come to this. So I am sure they paid and signed an agreement to do this.

Q They came to the event?

A Yes.

Q If you look in the tiny print Page 50 it says The West Investors Annual Meeting, did that event take place?

A Yes.

Q Was that a successful event?

A It was okay.

Q Do you know if you made a profit or a loss in that event?

A Not sure.

MR. WALLACE: Mark this as Plaintiff's 6.

(Several checks were marked as Plaintiff's Exhibit 6, for

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identification, as of this date.)

Q Showing you a document that is marked as Plaintiff's 6 and actually this would have had a bate's number since you did produce it, but it seems to be cut off, but I didn't see it.

MR. RISMAN: I usually remember putting those on.

Q So the page that your an attorney produced to us consists of several checks. First one at the top is New York Life Insurance Company to LinkBridge, dated March 12, 2018, \$3,750, can you tell me what that check was for?

A Sponsorship.

Q Would that be a sponsor of the May 2018 event?

A Correct.

Q The second check is Robert W. Beard & Company, dated December 5, 2017 for \$3,500, is that also a sponsorship?

A I don't remember exactly, but I listed him under sponsors, but I just don't -- if it was just two tickets and he asked to

P. Oliveira

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be listed as a sponsor.

Q What did a ticket to that event cost?

A Can I go back to this?

Q Sure.

A Somewhere from \$1,600, \$2,400, \$2,600.

Q Depending on when they were purchased?

A Yes.

Q If you purchased them before a certain date they were less expensive and then it became more expensive?

A That is correct.

Q If you look at the third check on that page, Robbins, Gallard, Redmond & Dowd LLP, is that also a sponsor, \$10,000?

A Yes.

Q That is a law firm, correct?

A That is a law firm.

Q Did they come to your event as a real estate --

A No.

Q Were they looking for clients or

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2 did they come because they themselves were
3 involved in the real estate business?

4 MR. RISMAN: Objection to
5 form.

6 You can answer.

7 Q If you know.

8 A But it wasn't specifically to
9 real estate. Are you asking me if the
10 conference was real estate? I don't
11 understand the question.

12 Q I will rephrase the question.
13 Why would Robbins, Gallard,
14 Redmond & Dowd attend your conference?

15 MR. RISMAN: Objection to
16 form.

17 You can answer.

18 A I don't know, to meet managers.

19 Q By the way, on some of the
20 e-mails that you produced I see the name
21 Pablo Patrick; is that you?

22 A Yes.

23 Q You use that name as a business
24 name?

25 A Yes.

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Q Do you use any other names?

A No, when I -- well, I think when I started I used Pablo Oliveira at first.

Q I meant other than your own name, have you used any other names besides Oliveira and Patrick as surnames?

A No.

MR. WALLACE: Mark this as Plaintiff's 7.

(A contract was marked as Plaintiff's Exhibit 7, for identification, as of this date.)

Q I am showing you a document that's marked as Plaintiff's 7, it's bated stamped by defendant 1-5. Is that the contract that you signed when you started at Markets Group?

A Yes, although the title was wrong.

Q What title do you mean when it says associates?

A Intern, right.

Q So this document I don't believe uses the word intern, are you saying that

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intern was a phrase that was in used at
Markets Group or is it your phrase?

A I was hired as an intern.

Q According to who?

A According to Tim.

Q Your testimony is that Tim told
you you were an intern?

A I was an intern.

Q What does intern mean to you, how
do you interpret the word intern?

A That I wasn't full-time and
salaried.

Q When you say the title is wrong,
you're not making the allegation that this
has been changed, you're saying you disagree
with what the contract says?

MR. RISMAN: Objection,
mischaracterizes his testimony,
but you can answer.

MR. WALLACE: I am asking
him what his testimony --

MR. RISMAN: You're asking
him if that is what he's
testifying.

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A I don't think they were organized enough to put intern there I guess, I am not sure.

Q That is your signature on Page 5?

A Yes.

MR. WALLACE: I think we are going to take a very brief break, we are kind of closing in on the finish.

(Whereupon, a recess was taken from 3:55 to 4:10 p.m.)

MR. WALLACE: We are back on the record. I have no further questions.

MR. RISMAN: I have one question for redirect if that is okay.

MR. WALLACE: Of course.

EXAMINATION BY

MR. RISMAN:

Q I want to direct your attention to what was previously marked as Plaintiff's 5, go to Page Defendant's 49, it's in the bottom right-hand corner, what is a media

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institutional partner?

A Those are just words, I mean I have them placed as a media partner and they just place a banner or a logo.

Q Do they pay to come to a conference?

A No.

MR. RISMAN: Nothing further.

MR. WALLACE: So we are just noting that the deposition will be signed under Rule 30-E.

-o0o-

(Whereupon, the deposition of Pablo Oliveira was concluded at 4:20 p.m.)

PABLO OLIVEIRA

Subscribed and sworn to
before me this _____ day
of _____, 2019

NOTARY PUBLIC

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I N D E X

<u>WITNESS</u>	<u>EXAMINATION BY</u>	<u>PAGE</u>
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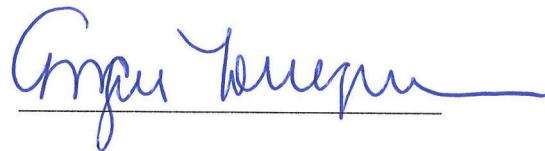
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C E R T I F I C A T E

I, Angela Torregrossa, a reporter
and Notary Public within and for the
State of New York, do hereby certify:

That the witness(es) whose
testimony is hereinbefore set forth was
duly sworn by me, and the foregoing
transcript is a true record of the
testimony given by such witness(es).

I further certify that I am not
related to any of the parties to this
action by blood or marriage, and that I
am in no way interested in the outcome
of this matter.



ANGELA TORREGROSSA

ERRATA SHEET

The following are my corrections to the
attached transcript:

<u>PAGE</u>		<u>LINE</u>	<u>SHOULD READ</u>
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